

TSD File Inventory Index

Date: April 13, 2000
Initial: CM Genevieve

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Facility Identification Number: <u>CHR 000 007 773</u>		
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.1 Correspondence		.2 All Other Permitting Documents (Not Part of the ARA)
.2 Notification and Acknowledgment		C.1 Compliance - (Inspection Reports)
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.1 Correspondence		.2 RFI Workplan
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.6 RFI QAPP Correspondence		.7 Lab Data, Soil-Sampling/Groundwater	
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.4 CMI Draft/Final Reports		.8 Endangered Species Act	
.5 CMI QAPP		.9 Environmental Justice	

Note: Transmittal Letter to Be Included with Reports.

Comments: _____



Advanced Searches



Select the options with which to search:

All searches are based on an **and** condition. [Hint](#)

Basic	Wildcard	Owner / Operator
Handler ID: OHR000007773	Handler Name:	
Location Street Number:	Location Street Name:	
Location City:	Location State: Select	Location Zip:
Location County: No Counties to Select	State District:	
<input type="checkbox"/> Check this box to search on active sites only.	<input type="checkbox"/> Click this box to also Search Other IDs.	<input type="checkbox"/> Click this box to do a historical name search.

[Search](#) [Reset Form](#) [Back to Main Menu](#)

Page: 1

There are 1 records, displaying 1 - 1. Select the handler to process.

Act Loc	▲ Handler ID ▼	▲ Handler Name ▼	▲ Address ▼	▲ City ▼	▲ State ▼	▲ County ▼	Active Status	In a Universe	Controls in Place
1	OH OHR000007773	WARREN STEEL HOLDINGS LLC	4000 MAHONING AVE	WARREN	OH	TRUMBULL	H---	Y	N

Page: 1

URL: /rcrainfo/searches/search.jsp



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TERRY KREBS

**UTILITIES, SCRAP PROCUREMENT &
SHIPPING COORDINATOR**

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State of Ohio Environmental Protection Agency

DIVISION OF HAZARDOUS WASTE MANAGEMENT

Northeast District Office

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DM WIM

Kris Coder
Environmental Specialist

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kris.coder@epa.state.oh.us



Land and Chemicals Division

Type of Document: **Notice of Violation with Inspection Report**




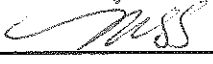
Facility Names: **Warren Steel Holdings LLC**

Facility Location: **4000 Mahoning Avenue**

City: **Warren** State: **Ohio** 44483

U.S. EPA ID# **OHR 000 007 773**

RCRA Branch contact: **Duncan Campbell** Phone: **6-4555**

Name	Signature	Date
RCRA Branch Contact		07/11/2011
ORC Attorney		7/22/2011
RCRA Branch APA		
CS #2 Section Chief		7-25-11
RCRA Branch Chief		7/27/11

MG
7/27

Directions after the Branch Chief signs this sheet and original letter:

- 1 Date stamp the original letter;
- 2 The original letter and a copy of the inspection report get mailed to the facility;
- 3 Make two copies of the original inspection report;
- 4 Place a copy of the letter with a copy of the inspection report in the section file; and
5. A copy of the letter with the original inspection report are sent to the RCRA File Room (7th Floor).

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Mr. Mark Trapp
Chief Operating Officer
Warren steel Holdings LLC
4000 Mahoning Avenue
Warren, OH 44483

2. Article Number

7009 1680 0000 7672 2582

PS Form 3811, March 2001

Domestic Return Receipt

102595-01-M-1424

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly) B. Date of Delivery

DONNA TRICKER 8/1/11

C. Signature

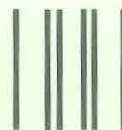
X Donna Tricker ☐ Agent ☐ AddresseeD. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type

- ☒ Certified Mail ☐ Express Mail
☐ Registered ☒ Return Receipt for Merchandise
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? (Extra Fee) ☐ Yes

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Duncan Campbell
USEPA (L-85)
71 W Jackson Blvd
Chicago, IL 60604

RECEIVED
DIVISION FRONT OFFICE

AUG 08 2011

LAND AND CHEMICALS DIVISION
U.S. EPA - REGION 5



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD

CHICAGO, IL 60604-3590

CERTIFIED MAIL 7009 1680 0000 7672 2582
RETURN RECEIPT REQUESTED

JUL 28 2011

REPLY TO THE ATTENTION OF:

LR-8J

Mr. Mark Trapp
Chief Operating Officer
Warren Steel Holdings LLC
4000 Mahoning Avenue
Warren, Ohio 44483

Re: Notice of Violation
RCRA Compliance Evaluation Inspection
Warren Steel Holdings LLC
EPA I.D. No.: OHR 000 007 773

Dear Mr. Trapp:

On June 16, 2011 representatives of the U.S. Environmental Protection Agency and the Ohio Environmental Protection Agency (Ohio EPA) inspected Warren Steel Holding's (WSH) facility, located in Warren, Ohio. The purpose of the inspection was to evaluate WSH's compliance with certain requirements of the Resource Conservation and Recovery Act (RCRA); specifically, those regulations related to the generation, treatment, and storage of hazardous waste for a large quantity generator. Please find an enclosed copy of the EPA inspection report and checklists for your reference.

Based on information provided by WSH's personnel, a review of records and personal observations by the inspectors, EPA finds that WSH is engaged in the management of hazardous waste without a hazardous waste permit, and is in violation of certain requirements of the Ohio Administrative Code (OAC). In the State of Ohio to be eligible for the exemption from the requirement to apply for and obtain a hazardous waste permit, WSH must be in compliance with the conditions of OAC 3745-52-34. Specifically, we find that WSH was in noncompliance with the following conditions for a hazardous waste permit exemption, and was in violation of the following hazardous waste management requirements:

1. In order to retain the exemption from the requirement to obtain a hazardous waste permit, a large quantity generator must inspect containers in its accumulation area weekly. See, OAC 3745-52-34(A)(1)(a), 3745-66-74 [40 C.F.R. §§ 262.34(a)(1)(i), 265.174]. This condition is also a requirement of OAC 3745-66-74 [40 C.F.R. § 265.174]. In the State of Ohio, a generator must also record the results of those inspections in a log or summary. See OAC 3745-52-34(A)(1)(a), 3745-66-74. This condition is also a requirement for owners and operators of hazardous waste facilities, under OAC 3745-66-74.

During the inspection, it was observed that WSH was not routinely conducting weekly inspections of the pneumatic bulk trailer and the roll-off box that are used to manage electric arc furnace dust (EAF Dust). The EAF Dust is a listed hazardous waste (K061). The EAF Dust is augured directly from the EAF baghouse into a Department of Transportation approved pneumatic bulk trailer. Subsequent to the inspection, on June 20, 2011 and July 5, 2011, WSH provided EPA with documentation of the procedural changes it is adopting for performing the weekly inspections and preserving the accompanying documenting of those inspections. Thus, no further actions are necessary with respect to these two items.

2. A large quantity generator who accumulates hazardous waste on-site for more than 90 days, and who does not meet the conditions for a permit exemptions of OAC 3745-52-34 [40 C.F.R. § 262.34], is an operator of a hazardous waste facility, and is required to obtain a hazardous waste permit. See, OAC 3745-55 [40 C.F.R. §§ 270.1, 270.10, and 270.13].

On failing to comply with the conditions for a permit exemption referenced in item # 1 above, WSH became an operator of a hazardous waste facility, and was required to apply for and to obtain a hazardous waste permit. WSH did not apply for, or obtain, a hazardous waste permit. WSH's failure to apply for and to obtain a hazardous waste permit violated the above-referenced licensing requirements of OAC 3745-55 [40 C.F.R. §§ 270.1, 270.10, and 270.13].

Under Section 3008(a) of RCRA, 42 U.S.C. § 6928(a), EPA may issue an order assessing a civil penalty for any past or current violation requiring compliance immediately or within a specified time period. At this time, EPA is not requiring WSH to apply for a hazardous waste permit, since WSH immediately established compliance with the above-referenced conditions for an exemption from having a permit to store hazardous waste and requirements, as documented in your June 20, 2011 and July 5, 2011 emails. By meeting all of the conditions for an exemption from obtaining a permit to store hazardous waste WSH is no longer required to comply with the above-referenced requirements for owners and operators of hazardous waste storage facilities. As such, EPA does not plan additional enforcement action at this time. However, this letter does not limit the applicability of the requirements evaluated, or of other federal or state statutes or regulations. EPA and Ohio EPA will continue to evaluate your facility in the future.

If you have any questions or concerns regarding this letter, please contact Duncan Campbell, of my staff, at 312-886-4555.

Sincerely,



Mary S. Setnicar
Acting Chief, RCRA Branch
Land and Chemicals Division

Enclosure

cc: Kris Coder, Ohio EPA, Northeast District Office, Twinsburg, Ohio

**U.S. EPA REGION 5
LAND and CHEMICALS DIVISION
RCRA BRANCH**

RCRA COMPLIANCE EVALUATION INSPECTION

FACILITY NAME: **Warren Steel Holdings LLC.**

FACILITY U.S. EPA ID NO.: **OHR 000 007 773**

FACILITY ADDRESS: 4000 Mahoning Road
Warren, Ohio 44483

FACILITY REPRESENTATIVES: Chris Green
Environmental, Health & Safety Manager
Warren Steel Holdings LLC
Terry Krebs
Utilities, Scrap Procurement & Shipping
Coordinator
Warren Steel Holdings LLC

Gene Ward
Electric Arc Furnace Baghouse Operator
Warren Steel Holdings LLC

U.S. EPA REPRESENTATIVE: Duncan Campbell
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Ohio EPA
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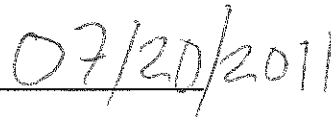
DATE OF INSPECTION: April 16, 2011

NAICS CODE: 331111 - Iron and Steel Mills

Prepared by


Duncan Campbell

Date



Received by


Paul Little

Date



Purpose of Inspection

This inspection was an evaluation of Warren Steel Holding LLC's (WSH) compliance with hazardous waste regulations found in the Ohio Administrative Code (OAC) and the Code of Federal Regulations. Mr. Campbell led the RCRA Compliance Evaluation Inspection. Mr. Coder from the Ohio EPA observed the inspection process and provided EPA with regulatory support.

Inspectors

Duncan Campbell, U.S. EPA, Region 5, RCRA Branch
Kris Coder, Ohio EPA, Northeast District Office, Twinsburg, Ohio

Site Participants

Chris Green
Environmental, Health & Safety Manager
Warren Steel Holdings LLC

Terry Krebs
Utilities, Scrap Procurement & Shipping Coordinator
Warren Steel Holdings LLC

Gene Ward
Electric Arc Furnace Baghouse Operator
Warren Steel Holdings LLC

Introduction

On April 16, 2011, Inspectors Campbell and Coder arrived at WSH's facility at approximately 10:00 A.M. Mr. Campbell introduced himself and Mr. Coder to Mr. Green at WSH's security gate.

Mr. Campbell explained that the inspectors were at WSH to conduct a hazardous waste inspection. Mr. Campbell then displayed his EPA enforcement credentials to Mr. Green. Mr. Campbell explained that EPA would be evaluating the facility's compliance with the relevant portions of the Ohio Administrative Code and the Code of Federal Regulations.

Mr. Green escorted the inspectors, by car, to the building that contained his office. Mr. Green and the inspectors sat down around the table in his office and Mr. Green called WSH's environmental consultant, Brian P. Greenwald, Senior Project Engineer, Horizon Environmental, Grand Rapids, Michigan. Mr. Green and Mr. Greenwald collectively provided the inspectors with a brief history of the facility and explained the steel making conducted here.

Site Description

WSH operates a melt shop that continuously casts carbon and alloy steel cast rounds in one mill on 20 acres. Scrap metal and various alloys are fed to a 100 ton electric arc furnace. WSH pours "heats" according to the specifications of the customer. This is the only manufacturing process that is currently being done on WSH's property.

Ohio Star Forge Company, a subsidiary of Daido Steel is contiguously located next to WSH (and also located on the old Copperweld property). Ohio Star acquired an easement to access its property using a road that was part of the old Copperweld property. Ohio Star began operation in 1989 and currently operates four forging machines.

Steel making at WSH's exact location dates back to 1964. Copperweld Steel Corporation constructed this west thermal facility to make specialty bar products. Prior to 1964, this land had been used to store final and intermediary product and waste. Steel making at other locations on the 500 acre property have been documented to date back to 1924.

Universal Waste Generation

WSH generates used batteries and manages them as "Universal Waste." WSH currently ships them off-site to Enviroserve. Fluorescent and mercury lights are also managed as "Universal Waste" and again, sent off-site to Enviroserve. At the time of the inspections, containers of lights were labeled as "Universal Waste - Lights" and dated with the first date that bulbs were placed in the fiber container.

Craft Shop

WSH generates very little used oil from its processes. Typically, any oil generated results from the change out of gear boxes during routine maintenance. When it does generate oil, it containerizes it and stores it in the Craft Shop. At the time of the inspection, there were no containers of "Used Oil" being stored at the facility. WSH is currently using a vendor to recycle its "Used Oil."

Lagoons B & C

WSH generates waste water from facility sanitary disposal system and process waters. The process waters come from "caster spray" (water) that it sprays on freshly cast steel rounds (billets) as they slide down out of the caster. "Caster spray" is mixed with sanitary waste, non-contact cooling water and storm waters and conveyed through a process water sewer to a series of four lagoons that function as settling ponds. After being transferred through the four settling ponds the waste water is then treated in a chemical treatment system before being discharged under a NPDES permit into the Mahoning River. In the summer time, most of the waste water is recycled by being returned to the plant to be used again.

Historically, Copperweld and CSC applied an oil/water mixture to quench the freshly rolled steel coming out of its caster. CSC ceased operation of this equipment prior to seeking protection under Chapter 11 bankruptcy. This equipment was included in the remedial actions to remove the Aboveground Storage Tanks and associated oil/water separator and heat exchanger in 2001. WSH has not experienced a sheen on the four settling ponds during the past couple of years and therefore has not had to operate the belt skimmer associated with Lagoon C in several years.

Casting

"Caster spray" water is generated as a result of manufacturing steel rounds (billets). As

referenced above, WSH has discontinued using an oil/water mixture to quench the newly formed rounds. The "caster water" is captured in a tray, collected then combined with non-contact water and storm water and conveyed to the four lagoons. [See photos].

Electric Arc Furnace

The EAF has a 100 ton capacity. Mobile ladles are filled with scrap metal. Scrap is continuously sorted into piles of varying quality and alloys. Phoenix, the contractor, sorts scrap into grades and quality and also operates the loader that fills the ladles. [See photos].

Drop-Out Box

The drop out box is designed to capture large pieces (slag) of material that fall out of the air emissions duct. On April 26, 2000, the Steel Manufacturers Association (SMA) formally requested that EPA's Office of Solid Waste and Emergency Response (OSWER) make a determination as to whether this slag is regulated as a listed waste (K061) because it is part of the steel making process. On May 17, 2001, OSWER responded to SMA's request and issued an interpretation that materials generated in association with the operation of a drop-out box are not part of the baghouse dust collection and thus are not considered K061. OSWER further concluded that materials generated from the operation of the drop-out box are solid waste and therefore the generator must determine if they are hazardous for any of the toxic characteristic metals.

WSH hazardous waste vendor, Michigan Disposal, performed an analysis of drop-out box material. The results of the analysis indicate that it is not a hazardous waste. WSH has hired a contractor who once a week, during shut-down, uses a vacuum truck to remove built up materials from within the drop-out box. This material is transported to Michigan Disposal who landfills within one of its active cells.

EAF Baghouse

The baghouse was constructed in the 1980's. It consists of 16 modules. Each module contains 228 bags. Each bag is 34 feet long. EAF dust is conveyed from the steel making building, more than 500 feet by a blower that pulls a vacuum on the system capturing particulate from above the EAF.

WSH began evaluating the efficiency of its baghouse in April of 2011. WSH contracted Brian Rek to calibrate the system. Mr. Ed Perez of Ohio EPA's, Northeast District, in Twinsburg, has reviewed the findings and concluded that the baghouse was in compliance for the air parameters: particulates, carbon dioxide, sulfur dioxide and nitrogen oxide. WSH continues to perform maintenance on the baghouse and contracted Diamond Steel, to perform maintenance on the duct work and re-bag two of the modules during July.

A screw conveyor provides a continuous conveyance system. The network of screw conveyors are situated below all 16 modules. This system conveys the EAF dust to a central load-out spot. WSH has three pneumatic trailers that it employs to deliver the EAF dust to Horsehead in Palmerton, Pennsylvania. At all times one of these trailers is staged immediately under the

incline hopper. At the time of the inspection WSH was generating of 48,000 lbs. of EAF dust per operating day. The point of generation of hazardous waste is somewhere between when the material is evacuated from one of the 16 modules into the screw-conveyor system and when it exits the incline hopper and is pulled in to the pneumatic trailer. There is no intermediate storage between the two points.

Once the trailer has been filled with approximately 60,000 lbs a tractor is hooked up and it is taken to be weighted. If, the total gross weight of the truck and EAF dust exceed 80,000 lbs. then the pneumatic trailer is brought back to the baghouse where the excess is vacuumed (using a vacuum truck) into a staged 40 cubic yard roll-off box. The roll-off box is managed as hazardous waste (K061), and is kept closed; labeled as hazardous waste; and shipped off-site to Michigan Disposal. The roll-off box is also used to manage any incidental spillage of dust on to the concrete floor below all 16 modules. This concrete floor is swept twice daily while the steel mill is operating. The reason the roll-off box is sent to Michigan Disposal for treatment and disposal is that it is inconsistent (clumps) and has the possibility of being contaminated with foreign material (dirt) and therefore would not meet Horsehead's strict waste perimeters.

At the time of the inspection, both the transport pneumatic trailer and the roll-off box were labeled with the words "Hazardous Waste" and dated with the start accumulation date. Again, the pneumatic trailer, is typically staged for less than two days below the incline hopper.

EAF dust (K061) is the only hazardous waste WSH generates at this site. At the time of the inspection, WSH was not routinely performing weekly inspections and not recording or documenting those weekly inspections in an operating log. The requirement to document inspections is an Ohio EPA requirement. The requirement for large quantity generators to perform weekly inspections is both an Ohio EPA and an EPA requirement.

WSH instituted a new management protocol stipulating that weekly inspections of all hazardous wastes will be inspected weekly and those inspections will be documented in a log that is kept at the Warren facility.

Slag Management

Large quantities off slag are managed on site. WSH has contracted with Stein to manage this large inventory of material. Slag is removed from each "heat." Once it is cooled it is pulverized and stockpiled in a large area. It is added to salt and used during the winter on roads.

Record Review

Mr. Green provided the inspectors with copies of the WSH's manifests from 2010 and 2011. WSH has consistently been a large quantity generator in 2010 and 2011. All hazardous waste is currently being shipped to Horsehead [PAD 002 395 887] in Palmerton, Pennsylvania or Michigan Disposal [MID 000 724 831] in Belleville, Michigan. Mr. Brian Greenwald, Horizon Environmental, Grand Rapids, Michigan, recently updated the Contingency Plan for WSH. The inspectors reviewed this document and found it to meet Ohio EPA's requirements.

Mr. Green showed the inspectors WSH's annual training records. Training dates, names of attendees, job descriptions and job titles were all documented.

ATTACHMENTS:

Ohio EPA – Generator Inspection Form

Ohio EPA – Used Oil Inspection Form - Generators

Ohio EPA – Universal Waste Small Quantity Handler Inspection Form

Photo Log

Photo Log

Warren Steel Holdings LLC
EPA inspection June 16, 2011
Warren, Ohio 44483
[OHD 000 007 773]



Entrance to WSH from Mahoning Avenue – Electric Arc Furnace Dust Baghouse to the far left behind water tower. Most buildings are derelict and designated as off-limits due to safety concerns. WSH will tear these derelict buildings down in the future once they receive clearance for lead and pcb abatement.





"Drop-out" chamber – This point-of-generation is vacuumed once weekly and transported to EQ's Michigan Disposal facility as a solid waste. Both U.S. EPA and Ohio EPA have previously provided the steel making industry with a regulatory interpretation that waste generated in the "drop-out" chamber does not carry the listing of K061 for electric arc furnace dust. However, the material removed from the "drop-out" chamber remains a solid waste requiring the facility to perform a TCLP analysis to determine if the material is hazardous for one, or more, of the TC metals. WSH has performed this analysis and has determined the "drop-out" solids to not be a hazardous waste.



EAF Dust Conveyance - from the continuous casting mill (100 ton EAF) that was built in the 1980s.



Electric Arc Furnace Dust Baghouse – 16 modules. Each module contains 228 bags. WSH began retrofitting modules during the winter of 2010. Diamond Steel has been contracted to clean ducts and weld all holes. Each bag is 34 feet long. Last complete bag change was in 1999. Diamond is scheduled to complete two more modules during July shut-down.



Auger system below each of the modules. Conyers EAF baghouse dust to load-out point. Concrete floor underneath conveyance system is swept twice daily.



Another view of screw conveyor system below one of the modules.



Electric Arc Furnace Dust Baghouse and load-out area. WSH generates approximately 48,000 lbs of EAF dust a day. All EAF dust is conveyed in screw augers to one central point where it fills one of three pneumatic trailers that rotate every other day. In 2010, WSH generated 707,000 lbs of EAF dust. Currently, EAF dust is sent to Horsehead Resources in Pennsylvania [PAD 002 395 887].



Another view of pneumatic trailer being filled with EAF dust.



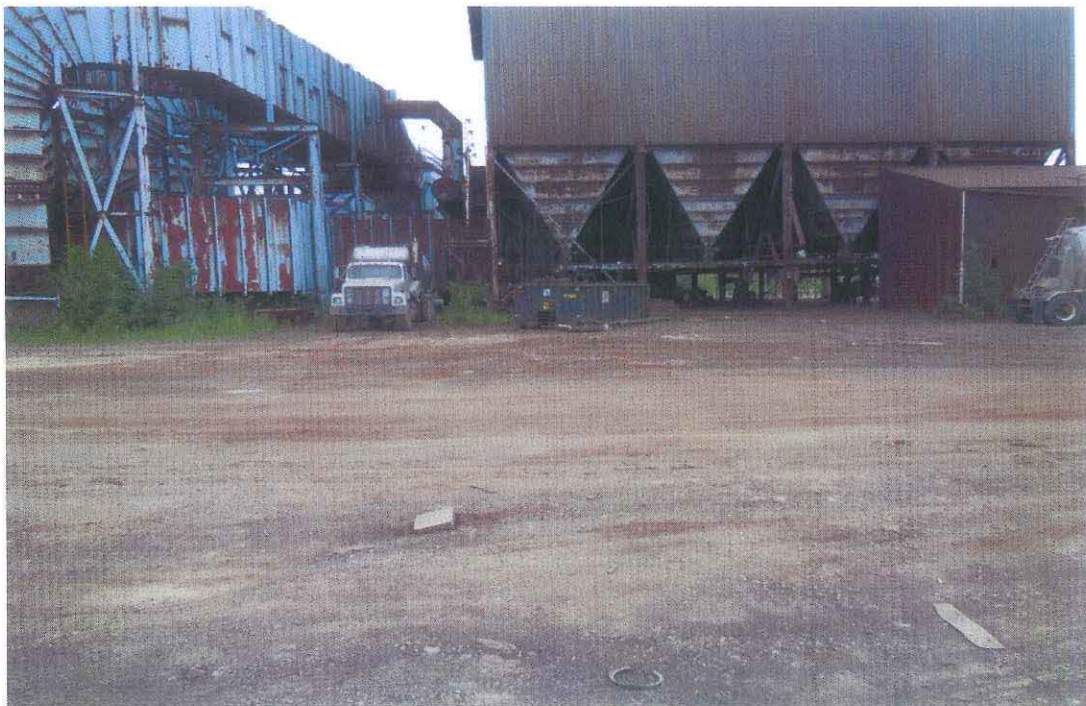
Connection to pneumatic trailer --- EAF dust "point of generation." Everything upstream of this point is part of the process. Currently, WSH is rotating three pneumatic trailers back and forth to Horsehead Recovery in Pennsylvania. The average generation rate of EAF dust is 48,000 lbs a day.



Front of pneumatic trailer staged while being loaded with EAF dust. Trailer is placarded with appropriate DOT placard and labeled as "Hazardous Waste."



Hazardous Waste label on pneumatic trailer while it is being filled for transport. Trailers typically are loaded within a day and half. WSH has three trailers that transport loads of EAF dust to Horsehead in Pennsylvania.



Roll-off and vacuum truck --- Pneumatic trailer is limited to 80,000 gross weight. Once the trailer has been filled it is weighted. If it exceeds 80,000 lbs. then excess is vacuumed in to roll-off box. WSH ships the roll-off box to EQ's Michigan Disposal. Sweepings and any releases are cleaned up and placed in the roll-off box.



Roll-off box staged near baghouse. Dust that has been swept up from underneath auger system that conveys the 16 modules to the load-off point is added to the roll-off box. When pneumatic trailers have been filled beyond their legal weight limit the excess is vacuumed in to the roll-off box.



Another angle of the roll-off box showing the hose used to connect the roll-off box to the pneumatic trailer.



Lid tightly shut on roll-off box which is a "Hazardous Waste" container. WSH ships this wastestream to Michigan Disposal in Bellville, Michigan [MID 000 724 831]. Horsehead only accepts very fine material that is free of contamination.



Showing overhead conveyance from casting area in the background. The foreground shows the vacuum that pulls EAF dust to the baghouse. Once it is brought to this point it is then blown in to the baghouse and to the capture system created by all of the bags within each module.



Pile of sorted scrap metal waiting to be charged.



Scrap metal being loaded in to ladle. Phoenix is the scrap metal contractor.



Scrap metal being loaded in ladle. WSH continuous casts using two charged ladles.



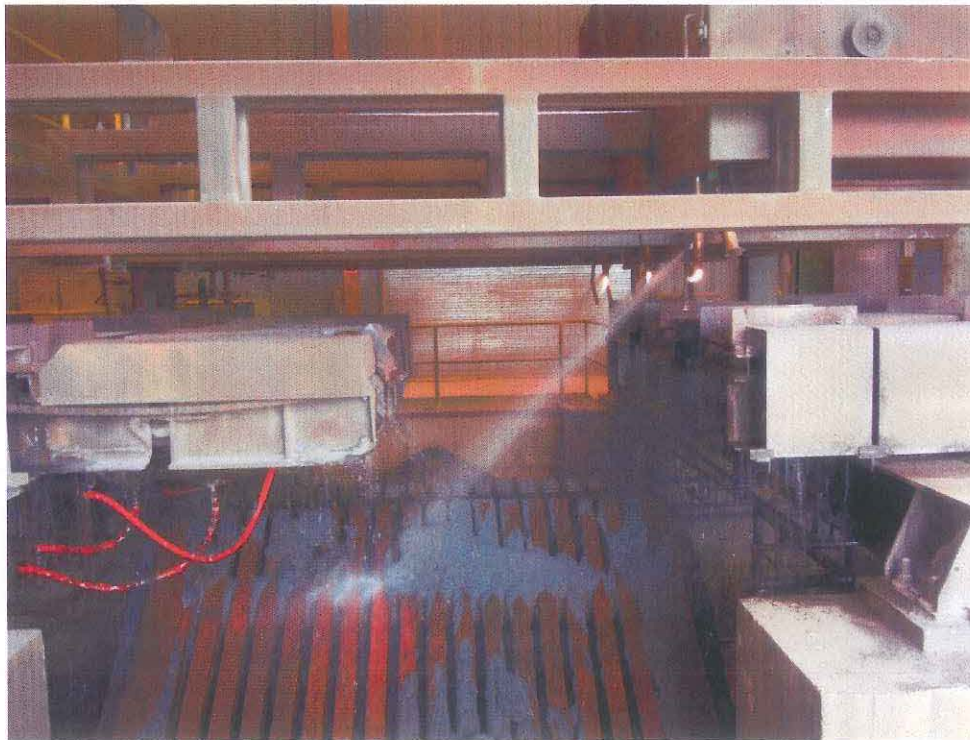
Another view of ladles staged ready to be charged during casting.



Ladle inside casting area.



Alloys and ingredients added during continuous casting.



Caster spray to cool cast as it rolls out. Water is recycled from wastewater treatment pond.



Rounds coming out from the cast after a pour. Ends are cut off and added to next pour.



Slag pile. Stein is the contractor who works with slag. Slag is sold as a product that is used added to salt for winter road conditions.



More slag.



Rounds (billits). WSH makes one product in different diameters and lengths.



Kinder Morgan is the contractor who manages rounds. All storage is outside. WSH prohibits entry in to old derelict buildings.

LARGE QUANTITY GENERATOR REQUIREMENTS
COMPLETE AND ATTACH A PROCESS DESCRIPTION SUMMARY

CESQG: ≤100 Kg. (Approximately 25-30 gallons) of waste in a calendar month or < 1 Kg. of acutely hazardous waste.
 SQG: Between 100 and 1,000 Kg. (About 25 to under 300 gallons) of waste in a calendar month.
 LQG: ≥ 1,000 Kg. (~300 gallons) of waste in a calendar month or ≥1 Kg. of acutely hazardous waste in a calendar month.
 NOTE: To convert from gallons to pounds: Amount in gallons x Specific Gravity x 8.345 = Amounts in pounds.

Safety Equipment Used:

GENERAL REQUIREMENTS

1.	Have all wastes generated at the facility been adequately evaluated? [3745-52-11]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
2.	Are records of waste determination being kept for at least 3 years? [3745-52-40(C)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
3.	Has the generator obtained a U.S. EPA identification number? [3745-52-12]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
4.	Were annual reports filed with Ohio EPA on or before March 1 st ? [3745-52-41(A)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
5.	Are annual reports kept on file for at least 3 years? [3745-52-40(B)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
6.	Has the generator transported or caused to be transported hazardous waste to other than a facility authorized to manage the hazardous waste? [ORC 3734.02(F)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
7.	Has the generator disposed of hazardous waste on-site without a permit or at another facility other than a facility authorized to dispose of the hazardous waste? [ORC 3734.02(E)&(F)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
8.	Does the generator accumulate hazardous waste?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>

NOTE: If the LQG does not accumulate or treat hazardous waste, it is not subject to 52-34 standards. All other requirements still apply, e.g., annual reports, manifest, marking, record keeping, LDR, etc.

9.	Has the generator accumulated hazardous waste on-site in excess of 90 days without a permit or an extension from the director ORC §3734.02(E)&(F)?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
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NOTE: If F006 waste is generated and accumulated for > 90 days and is recycled see 3745-52-34(G)&(H).

10.	Does the generator treat hazardous waste in a: [ORC 3734.02(E)&(F)]	
a.	Container that meets 3745-66-70 to 3745-66-77?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
b.	Tank that meets 3745-66-90 to 3745-66-100 except 3745-66-97(C)?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
c.	Drip pads that meet 3745-69-40 to 3745-69-45?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
d.	Containment building that meets 3745-256-100 to 3745-256-102?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

NOTE: Complete appropriate checklist for each unit.

NOTE: If waste is treated to meet LDRs, use LDR checklist.

11.	Does the generator export hazardous waste? If so:	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
a.	Has the generator notified U.S. EPA of export activity? [3745-52-53(A)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
b.	Has the generator complied with special manifest requirements? [3745-52-54]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
c.	For manifests that have not been returned to the generator: has an exception report been filed? [3745-52-55]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
d.	Has an annual report been submitted to U.S. EPA? [3745-52-56]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

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e.	Are export related documents being maintained on-site? [3745-52-57(A)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
MANIFEST REQUIREMENTS		
12.	Have all hazardous wastes shipped off-site been accompanied by a manifest? (U.S. EPA Form 8700-22) [3745-52-20(A)(1)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
13.	Have items (1) through (20) of each manifest been completed? [3745-52-20(A)(1)]&[3745-52-27(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
NOTE: U.S. EPA Form 8700-22(A) (the continuation form) may be needed in addition to Form 8700-22. In these situations items (21) through (35) must also be completed. [3745-52-20(A)(1)]		
14.	Does each manifest designate at least one facility which is permitted to handle the waste? [3745-52-20(B)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
NOTE: The generator may designate on the manifest one alternate facility to handle the waste in the event of an emergency which prevents the delivery of waste to the primary designated facility. [3745-52-20(C)]		
15.	If the transporter was unable to deliver a shipment of hazardous waste to the designated facility, did the generator designate an alternate TSD facility or give the transporter instructions to return the waste? [3745-52-20(D)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
16.	Have the manifests been signed by the generator and initial transporter? [3745-52-23(A)(1)&(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
NOTE: Remind the generator that the certification statement they signed indicates: 1) they have properly prepared the shipment for transportation and 2) they have a program in place to reduce the volume and toxicity waste they generate.		
17.	If the generator received a rejected load or residue and accumulated the waste on-site, did the generator sign item 18c or 20 of the manifest? [3745-52-34(M)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
18.	If the generator did not receive a return copy of each completed manifest within 35 days of the waste being accepted by the transporter, did the generator contact the transporter and/or TSD facility to check on the status of the waste? [3745-52-42(A)(1)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
19.	If the generator has not received the manifest within 45 days, did the generator file an exception report with Ohio EPA? [3745-52-42(A)(2)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
20.	Are signed copies of all manifests and any exception reports being retained for at least three years? [3745-52-40]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
NOTE: Waste generated at one location and transported along a publicly accessible road for temporary consolidated storage or treatment on a contiguous property also owned by the same person is not considered "on-site" and manifesting and transporter requirements must be met. To transport "along" a public right-of-way the destination facility has to act as a transfer facility or have a permit because this is considered to be "off-site." For additional information see the definition of "on-site" in OAC rule 3745-50-10.		
PERSONNEL TRAINING		
21.	Does the generator have a training program which teaches facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to their positions? [3745-65-16(A)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
22.	Does the personnel training program, at a minimum, include instructions to ensure that facility personnel are able to respond effectively to emergencies involving hazardous waste by familiarizing them with emergency procedures, emergency equipment and emergency systems (where applicable)? [3745-65-16(A)(3)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
NOTE: For facility employees that receive emergency response training pursuant to OSHA regulations, the facility is not required to provide separate emergency response training, provided that the overall facility training meets all the requirements of OAC 3745-65-16(A). [3745-65-16(A)(4)]		
23.	Is the personnel training program directed by a person trained in hazardous waste management procedures? [3745-65-16(A)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
24.	Do new employees receive training within six months after the date of hire (or assignment to a new position)? [3745-65-16(B)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
25.	Does the generator provide annual refresher training to employees? [3745-65-16(C)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

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26.	Does the generator keep records and documentation of:		Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	a.	Job titles? [3745-65-16(D)(1)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	b.	Job descriptions? [3745-65-16(D)(2)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	c.	Type and amount of training given to each person? [3745-65-16(D)(3)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	d.	Completed training or job experience required? [3745-65-16(D)(4)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
27.	Are training records for current personnel kept until closure of the facility and are training records for former employees kept for at least three years from the date the employee last worked at the facility? [3745-65-16(E)]		Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>

NOTE: The following section can be used by the inspector to document that all personnel who are involved with hazardous waste management have been trained. The employees who need training (written and/or on-the-job) may include the following: environmental coordinators, drum handlers, emergency coordinators, personnel who conduct hazardous waste inspections, emergency response teams, personnel who prepare manifest, etc.

Job Performed	Name of Employee	Date Trained
OPERATES BAYHOMER	Gene WOOD	01/2011
MANAGES BAYHOMER	MARY KREBS	01/2011
ENVIRONMENTAL MGR SYSTEM	Chris Green	01/2011

CONTINGENCY PLAN

28.	Does the owner/operator have a contingency plan to minimize hazards to human health or the environment from fires, explosions or any unplanned release of hazardous waste? [3745-65-51(A)]		Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
29.	Does the plan describe the following:		Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	a.	Actions to be taken in response to fires, explosions or any unplanned release of hazardous waste? [3745-65-52(A)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	b.	Arrangements with emergency authorities? [3745-65-52(C)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	c.	A current list of names, addresses and telephone numbers (office and home) of all persons qualified to act as emergency coordinator? [3745-65-52(D)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	d.	A list of all emergency equipment, including: location, a physical description and brief outline of capabilities? [3745-65-52(E)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	e.	An evacuation plan for facility personnel where there is possibility that evacuation may be necessary? [3745-65-52(F)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>

NOTE: If the facility already has a "Spill Prevention, Control and Countermeasures Plan" under 40 CFR Part 112 or 40 CFR Part 1510, or some other emergency plan, the facility can amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with OAC requirements. The facility may develop one contingency plan which meets all regulatory requirements. Ohio EPA recommends that the plan be based on the "National Response Team's Integrated Contingency Plan Guidance (One Plan)." [3745-65-52(B)]

30.	Is a copy of the plan (plus revisions) kept on-site and been given to all emergency authorities that may be requested to provide emergency services? [3745-65-53(A)&(B)]		Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
31.	Has the generator revised the plan in response to rule changes, facility, equipment and personnel changes, or failure of the plan? [3745-65-54]		Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
32.	Is an emergency coordinator available at all times (on-site or on-call)? [3745-65-55]		Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>

NOTE: The emergency coordinator shall be thoroughly familiar with: (a) all aspects of the facility's contingency plan; (b) all operations and activities at the facility; (c) the location and characteristics of waste handled; (d) the location of all records within the facility; (e) facility layout; and (f) shall have the authority to commit the resources needed to implement provisions of the contingency plan.

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EMERGENCY PROCEDURES			
33.	Has there been a fire, explosion or release of hazardous waste or hazardous waste constituents since the last inspection? If so:		Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
	a.	Was the contingency plan implemented? [3745-65-51(B)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	b.	Did the facility follow the emergency procedures in 3745-65-56(A) through (H)?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	c.	Did the facility submit a report to the Director within 15 days of the incident as required by 3745-65-56(I)?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
NOTE: OAC 3745-65-51(B) requires that the contingency plan be implemented immediately whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents, which could threaten human health and the environment.			
PREPAREDNESS AND PREVENTION			
34.	Is the facility operated to minimize the possibility of fire, explosion, or any unplanned release of hazardous waste? [3745-65-31]		Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
35.	Does the generator have the following equipment at the facility, if it is required due to actual hazards associated with the waste:		
	a.	Internal communications or alarm system? [3745-65-32(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	b.	Emergency communication device? [3745-65-32(B)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	c.	Portable fire control, spill control and decon equipment? [3745-65-32(C)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	d.	Water of adequate volume/pressure per documentation or facility rep? [3745-65-32(D)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
NOTE: Verify that the equipment is listed in the contingency plan.			
36.	Is emergency equipment tested (inspected) as necessary to ensure its proper operation in time of emergency? [3745-65-33]		Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
37.	Are emergency equipment tests (inspections) recorded in a log or summary? [3745-65-33]		Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
38.	Do personnel have immediate access to an internal alarm or emergency communication device when handling hazardous waste (unless the device is not required under 3745-65-32)? [3745-65-34(A)]		Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
39.	If there is only one employee on the premises, is there immediate access to a device (eg., phone, hand held two-way radio) capable of summoning external emergency assistance (unless not required under 3745-65-32)? [3745-65-34(B)]		Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
40.	Is adequate aisle space provided for unobstructed movement of emergency or spill control equipment? [3745-65-35]		Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
41.	Has the generator attempted to familiarize emergency authorities with possible hazards and facility layouts? [3745-65-37(A)]		Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
42.	Where authorities have declined to enter into arrangements or agreements, has the generator documented such a refusal? [3745-65-37(B)]		Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
SATELLITE ACCUMULATION AREA REQUIREMENTS			
43.	Does the generator ensure that satellite accumulation area(s):		
	a.	Are at or near a point of generation? [3745-52-34(C)(1)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	b.	Are under the control of the operator of the process generating the waste? [3745-52-34(C)(1)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	c.	Do not exceed a total of 55 gallons of hazardous waste per waste stream? [3745-52-34(C)(1)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	d.	Do not exceed one quart of acutely hazardous waste at any one time? [3745-52-34(C)(1)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

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e.	Containers are closed, in good condition and compatible with wastes stored in them? [3745-52-34(C)(1)(a)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
f.	Containers are marked with words "Hazardous Waste" or other words identifying the contents? [3745-52-34(C)(1)(b)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
44.	Is the generator accumulating hazardous waste(s) in excess of the amounts listed in the preceding question? If so:	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
a.	Did the generator comply with 3745-52-34(A)(1) through (4) or other applicable generator requirements within three days? [3745-52-34(C)(2)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
b.	Did the generator mark the container(s) holding excess with the accumulation date when the 55 gallon (one quart) limit was exceeded? [3745-52-34(C)(2)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>

NOTE: The satellite accumulation area is limited to 55 gallons of hazardous waste accumulated from a distinct point of generation in the process under the control of the operator of the process generating the waste (less than 1 quart for acute hazardous waste). There could be individual waste streams accumulated in an area from different points of generation.

USE AND MANAGEMENT OF CONTAINERS IN <90 DAY ACCUMULATION AREAS

45.	Has the generator marked containers with the words "Hazardous Waste?" [3745-52-34(A)(3)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
46.	Is the accumulation date on each container? [3745-52-34(A)(2)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
47.	Are hazardous wastes stored in containers which are:			
a.	Closed (except when adding/removing wastes)? [3745-66-73(A)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
b.	In good condition? [3745-66-71]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
c.	Compatible with wastes stored in them? [3745-66-72]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
d.	Handled in a manner which prevents rupture/leakage? [3745-66-73(B)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>

NOTE: Record location on process summary sheets, photograph the area, and record on facility map.

48.	Is the container accumulation areas(s) inspected weekly? [3745-66-74]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
a.	Are inspections recorded in a log or summary? [3745-66-74]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>

NOTE: "Week" means 7 consecutive days per ORC§1.44(A).

49.	Are containers of ignitable or reactive wastes located at least 50 feet (15 meters) from the facility's property line? [3745-66-76]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
50.	Are containers of incompatible wastes stored separately from each other by means of a dike, berm, wall or other device? [3745-66-77(C)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
51.	If the generator places incompatible wastes, or incompatible wastes and materials in the same container, is it done in accordance with 3745-65-17(B)? [3745-66-77(A)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
52.	If the generator places hazardous waste in an unwashed container that previously held an incompatible waste, is it done in accordance with 3745-65-17(B)? [3745-66-77(B)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>

NOTE: OAC 3745-65-17(B) requires that the generator treat, store, or dispose of ignitable or reactive waste, and the mixture or commingling of incompatible wastes, or incompatible wastes and materials so that it does not create undesirable conditions or threaten human health or the environment.

53.	If the generator has closed a <90 day accumulation area does the closure appear to have met the closure performance standard of 3745-66-11? [3745-52-34(A)(1)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
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NOTE: Please provide a description of the unit and documentation provided by the generator for the file to demonstrate that closure was completed in accordance with the closure performance standards. If the generator has closed a <90 day tank, closure must also be completed in accordance with OAC 3745-66-97 (except for paragraph C of this rule). [3745-52-34]

PRE-TRANSPORT REQUIREMENTS

54.	Does the generator package/label its hazardous waste in accordance with the applicable DOT regulations? [3745-52-30, 3745-52-31 and 3745-52-32(A)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
55.	Does each container ≤119 gallons have a completed hazardous waste label? [3745-52-32(B)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
56.	Before off-site transportation, does the generator placard or offer the appropriate DOT placards to the initial transporter? [3745-52-33]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>

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USED OIL INSPECTION CHECKLIST **GENERATORS, COLLECTION CENTERS AND AGGREGATION POINTS**

NOTE: A facility is subject to the federal SPCC regulations (40 CFR 112) if it is non-transportation related (e.g., fixed) and has an aggregate above ground storage capacity greater than 1,320 gallons or a total underground storage capacity greater than 42,000 gallons of oil (including used oil), and there is reasonable expectation of a discharge to navigable waters.

PROHIBITIONS

1.	Does the generator manage used oil in a surface impoundment or waste pile? If yes:	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
a.	Is the surface impoundment or waste pile regulated as a hazardous waste management unit? [3745-279-12(A)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>

NOTE: For example, used oil contaminated scrap metal stored in a pile.

2.	Is used oil used as a dust suppressant? [3745-279-12(B)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
3.	Is off-specification used oil fuel burned for energy recovery in devices specified in 3745-279-12(C)?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>

NOTE: Multiple used oil checklists may be applicable if used oil handler is performing multiple tasks (e.g., generating used oil and shipping directly to a burner, complete generator and marketer checklists at a minimum).

GENERATOR STANDARDS

4.	Does the generator mix hazardous waste with used oil? If so,	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
a.	Is the mixture managed as specified in 3745-279-10(B)? [3745-279-21(A)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>

NOTE: Used Oil mixed with listed (3745-51-30 to 3745-51-35) or characteristic (3745-51-20 to 3745-51-24) hazardous waste are subject to regulation as a hazardous waste, unless the listed hazardous waste is listed solely because it exhibits a hazardous characteristic, and the resultant mixtures do not exhibit a characteristic. Mixtures of used oil and CESQG hazardous waste are subject to OAC Chapter 3745-279.

5.	Does the generator of a used oil containing greater than 1,000 ppm total halogens manage the used oil as a hazardous waste unless the presumption is rebutted successfully? [3745-279-21(B)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
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NOTE: If used oil contains greater than 1000 ppm total halogens, it is presumed to be listed hazardous waste until the presumption is successfully rebutted.

6.	Does the generator store used oil in tanks; or containers; or a unit(s) subject to regulation as a hazardous waste management unit? [3745-279-22(A)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
7.	Are containers and aboveground tanks used to store used oil in good condition with no visible leaks? [3745-279-22(B)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
8.	Are containers, above ground tanks, and fill pipes used for underground tanks clearly labeled or marked "Used Oil"? [3745-279-22(C)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
9.	Has the generator, upon detection of a release of used oil, done the following: [3745-279-22(D)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
a.	Stopped the release?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
b.	Contained the release?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
c.	Cleaned up and properly managed the used oil and other materials?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
d.	Repaired or replaced the containers or tanks prior to returning them to service, if necessary?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>

ON-SITE BURNING IN SPACE HEATER

10.	Does the generator burn used oil in used-oil fired space heaters? [3745-279-23] If so:	NO		
a.	Does the heater burn only used oil that owner/operator generates or used oil received from household do-it-yourself (DIY) used oil generators?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>

Warren Steel Holding LLC [Facility Name/Inspection Date]
 OHR 000 007 773 [ID Number]
 Used Oil Checklist for Generators/June 2008
 Inspected on 06/16/2011
 Page 1 of 2

b.	Is the heater designed to have a maximum capacity of not more than 0.5 million BTU per hour?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
c.	Are the combustion gases from heater vented to the ambient air?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>

NOTE: Ash accumulated in a space heater must be managed in accordance with 3745-279-10(E).

GENERATOR TRANSPORTATION

11.	Does the generator have the used oil hauled only by transporters that have obtained a U.S. EPA ID#? [3745-279-24]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
12.	If the generator self-transported used oil to an approved collection site or to an aggregation point owned by the generator: [3745-279-24]			
a.	Does the generator transport used oil in a vehicle owned by the generator or an employee of the generator? [3745-279-24]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
b.	Does the generator transport more than 55 gallons of used oil at any time? [3745-279-24]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>

NOTE: Used oil generators may arrange for used oil to be transported by a transporter without a U.S. EPA ID # if the used oil is reclaimed under a contractual agreement (i.e., tolling arrangement).

COLLECTION CENTERS AND AGGREGATION POINTS

13.	Is the DIY used oil collection center in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-30]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
14.	Is the non-DIY used oil collection center registered with Ohio EPA? [3745-279-31]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
15.	Is the used oil aggregation point in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-32]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>

NOTE: Complete Used Oil Generator and any other applicable used oil handler checklist (e.g., marketer, burner, etc.) for used oil collection centers and aggregation points.

SMALL QUANTITY UNIVERSAL WASTE HANDLER REQUIREMENTS – BATTERIES AND LAMPS		
Large Quantity Universal Waste Handler (LQUWH) = 5,000 Kg or more		
Small Quantity Universal Waste Handler (SQUWH) = 5,000 Kg or less		
PROHIBITIONS		
1.	Did the SQUWH dispose of universal waste? [3745-273-11(A)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
2.	Did the SQUWH dilute or treat universal waste, except when responding to releases as provided in OAC rule 3745-273-17 or managing specific wastes as provided in OAC rule 3745-273-13? [3745-273-11(B)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
WASTE MANAGEMENT AND LABELING/MARKING		
UNIVERSAL WASTE BATTERIES		
3.	Are batteries that show evidence of leakage, spillage or damage that could cause leaks contained? [3745-273-13(A)(1)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
4.	If batteries are contained, are the containers closed and structurally sound, compatible with the contents of the battery and lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(A)(1)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
5.	Are the casings of the batteries breached, not intact, or open (except to remove the electrolyte)? [3745-273-13(A)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
6.	If the electrolyte is removed or other wastes generated, has it been determined whether the electrolyte or other wastes exhibit a characteristic of hazardous waste? [3745-273-13(A)(3)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
a.	If the electrolyte or other waste is characteristic, is it managed in compliance with OAC Chapters 3745-50 through 3745-69? [3745-273-13(A)(3)(a)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
b.	If the electrolyte or other waste is not hazardous, is it managed in compliance with applicable law? [3745-273-13(A)(3)(b)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
7.	Are the batteries or containers of batteries labeled with the words "Universal Waste - Batteries" or "Waste Battery(ies)" or "Used Battery(ies)"? [3745-273-14(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
UNIVERSAL WASTE LAMPS		
8.	Does the SQUWH contain lamps in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with contents of the lamps? Are containers or packages closed and do they lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(D)(1)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
9.	Are lamps that show evidence of breakage, leakage or damage that could cause a release of mercury or hazardous constituents into the environment immediately cleaned up? Are they placed into a container that is closed, structurally sound, compatible with the contents of the lamps, and lack evidence of leakage, spillage or damage that could cause leakage or releases of mercury or hazardous waste constituents to the environment? [3745-273-13(D)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
<p>NOTE: Treatment (such as crushing) by a UWH is prohibited under this rule unless the facility is permitted for such activities [3745-273-31(B)]. A generator crushing lamps must manage lamps according to hazardous waste rules (OAC Chapter 3745-52). Lamp crushing is a form of generator treatment (OAC rule 3745-52-34). Crushed lamps must be transported by a registered hazardous waste transporter to a permitted hazardous waste facility using a hazardous waste manifest.</p>		
10.	Are the lamps or containers or packages of lamps labeled with the words "Universal Waste - Lamp(s)" or "Waste Lamp(s)" or "Used Lamp(s)"? [3745-273-14(E)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

Warren Steel Holdings LLC
OHR 000 007 723
Inspected on 06/16/2011

ACCUMULATION TIME		
11.	Is the waste accumulated for less than one year? [3745-273-15(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	a. If not, is the waste accumulated over one year in order to facilitate proper recovery, treatment or disposal? (Burden of proof is on the handler to demonstrate) [3745-273-15(B)] (this change makes it like the LQUWH checklist)	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
NOTE: Accumulation is defined as date generated or date received from another handler.		
12.	Is the handler able to demonstrate the length of time the universal waste has been accumulated? [3745-273-15(C)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	If yes, describe below:	
EMPLOYEE TRAINING		
13.	Are employees who handle or have the responsibility for managing universal waste informed of waste handling/emergency procedures, relative to their responsibilities? [3745-273-16]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
RESPONSE TO RELEASES		
14.	Are releases of universal waste and other residues immediately contained? [3745-273-17(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
15.	Is the material released characterized? [3745-273-17(B)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
16.	If the material released is a hazardous waste, was it managed as required in OAC Chapters 3745-50 through 3745-69? (If the waste is hazardous, the handler is considered the generator of the waste and is subject to OAC Chapter 3745-52) [3745-273-17(B)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
OFF-SITE SHIPMENTS		
NOTE: If a SQUWH self-transport waste, then the handler must comply with the Universal Waste transporter requirements.		
17.	Are universal wastes sent to either another handler, destination facility or foreign destination? [3745-273-18(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
18.	Is the handler aware of DOT requirements for packaging and shipping? If no, make aware of 49 CFR 171-180.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
19.	Prior to shipping universal waste off-site, does the originating handler ensure that the receiver agrees to receive the shipment? [3745-273-18(D)] (this change makes it like the LQUWH checklist)	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
20.	Has the originating handler ever had an off-site shipment rejected by another handler or destination facility?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
	a. If yes, did the originating handler receive the waste back or agree to where the shipment was sent? [3745-273-18(E)(2)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
21.	If a handler rejects a partial or full load from another handler, does the receiving handler contact the originating handler and discuss and do <u>one</u> of the following:	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	a. Send the waste back to the originating handler or send the shipment to a destination facility (If both the originating and receiving handler agree)? [3745-273-18(F)(2)] (this change makes it like the LQUWH checklist)	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
22.	If the handler received a shipment of hazardous waste that was not a universal waste, did the SQUWH immediately notify Ohio EPA? [3745-273-18(G)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

EXPORTS			
23.	Is waste being sent to a foreign destination? If so:		Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
	a.	Does the small quantity handler comply with primary exporter requirements in OAC rules 3745-52-53, 3745-52-56, and 3745-52-57? [3745-273-20(A)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	b.	Is waste exported only upon consent of the receiving country and in conformance with the U.S. EPA "Acknowledgment of Consent" as defined in OAC rules 3745-52-50 to 3745-52-57? [3745-273-20(B)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	c.	Is a copy of the U.S. EPA "Acknowledgment of Consent" provided to the transporter? [3745-273-20(C)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

Extra Set
Color photos

Photo Log

**Warren Steel Holdings LLC
EPA inspection June 16, 2011
Warren, Ohio 44483
[OHD 000 007 773]**



Entrance to WSH from Mahoning Avenue – Electric Arc Furnace Dust Baghouse to the far left behind water tower. Most buildings are derelict and designated as off-limits due to safety concerns. WSH will tear these derelict buildings down in the future once they receive clearance for lead and pcb abatement.





"Drop-out" chamber – This point-of-generation is vacuumed once weekly and transported to EQ's Michigan Disposal facility as a solid waste. Both U.S. EPA and Ohio EPA have previously provided the steel making industry with a regulatory interpretation that waste generated in the "drop-out" chamber does not carry the listing of K061 for electric arc furnace dust. However, the material removed from the "drop-out" chamber remains a solid waste requiring the facility to perform a TCLP analysis to determine if the material is hazardous for one, or more, of the TC metals. WSH has performed this analysis and has determined the "drop-out" solids to not be a hazardous waste.



EAF Dust Conveyance - from the continuous casting mill (100 ton EAF) that was built in the 1980s.



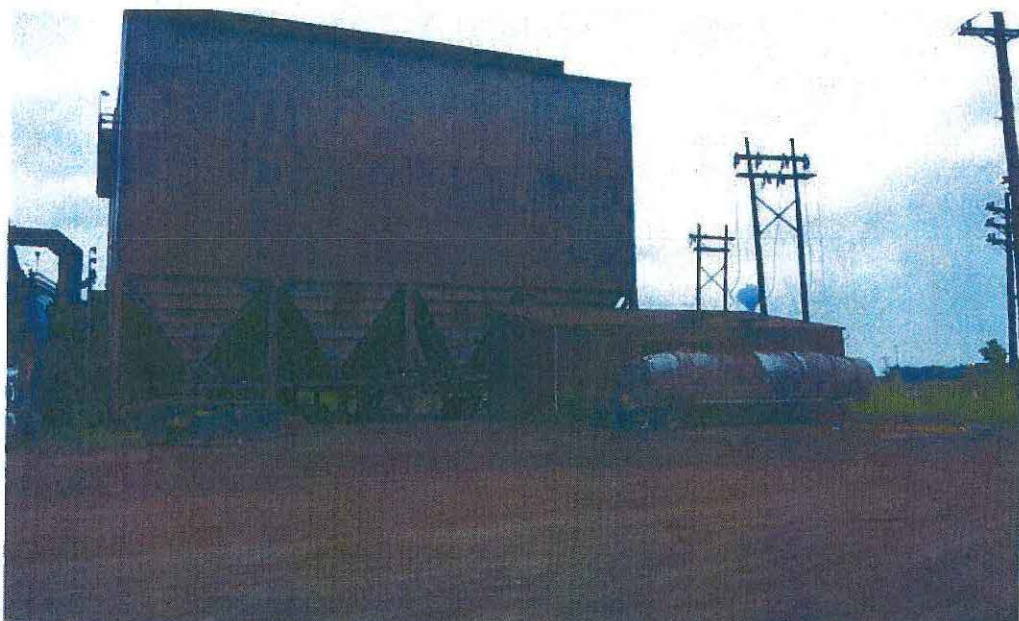
Electric Arc Furnace Dust Baghouse – 16 modules. Each module contains 228 bags. WSH began retrofitting modules during the winter of 2010. Diamond Steel has been contracted to clean ducts and weld all holes. Each bag is 34 feet long. Last complete bag change was in 1999. Diamond is scheduled to complete two more modules during July shut-down.



Auger system below each of the modules. Conyers EAF baghouse dust to load-out point. Concrete floor underneath conveyance system is swept twice daily.



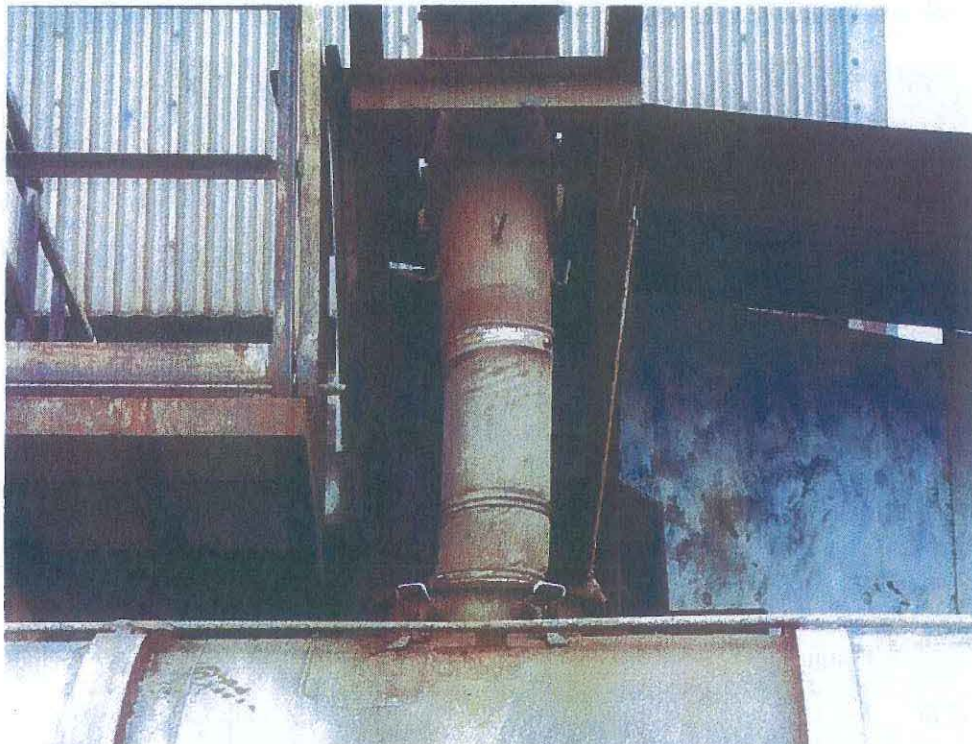
Another view of screw conveyor system below one of the modules.



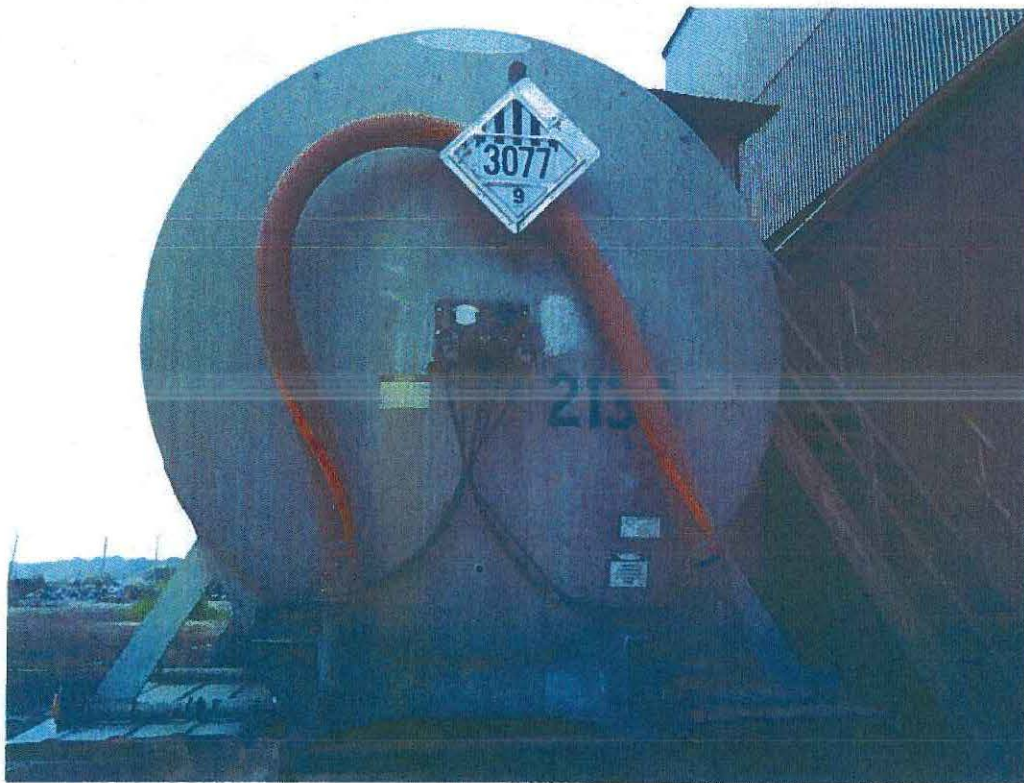
Electric Arc Furnace Dust Baghouse and load-out area. WSH generates approximately 48,000 lbs of EAF dust a day. All EAF dust is conveyed in screw augers to one central point where it fills one of three pneumatic trailers that rotate every other day. In 2010, WSH generated 707,000 lbs of EAF dust. Currently, EAF dust is sent to Horsehead Resources in Pennsylvania [PAD 002 395 887].



Another view of pneumatic trailer being filled with EAF dust.



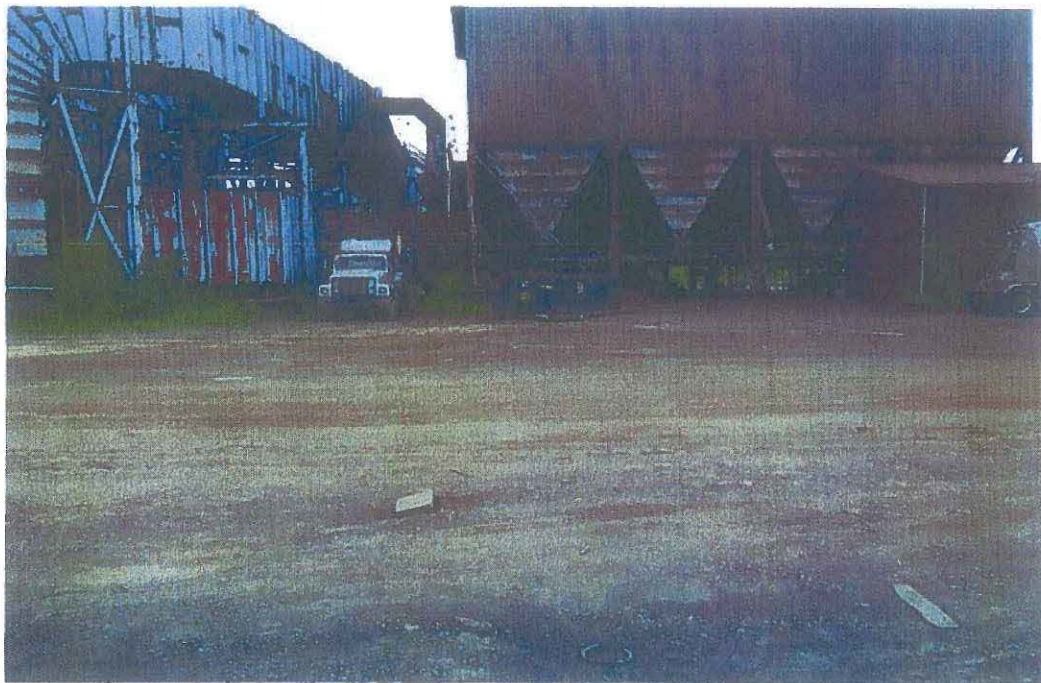
Connection to pneumatic trailer --- EAF dust "point of generation." Everything upstream of this point is part of the process. Currently, WSH is rotating three pneumatic trailers back and forth to Horsehead Recovery in Pennsylvania. The average generation rate of EAF dust is 48,000 lbs a day.



Front of pneumatic trailer staged while being loaded with EAF dust. Trailer is placarded with appropriate DOT placard and labeled as "Hazardous Waste."



Hazardous Waste label on pneumatic trailer will it is being filled for transport. Trailers typically are loaded within a day and half. WSH has three trailers that transport loads of EAF dust to Horsehead in



Roll-off and vacuum truck --- Pneumatic trailer is limited to 80,000 gross weight. Once the trailer has been filled it is weighted. If it exceeds 80,000 lbs. then excess is vacuumed in to roll-off box. WSH ships the roll-off box to EQ's Michigan Disposal. Sweepings and any releases are cleaned up and placed in the roll-off box.



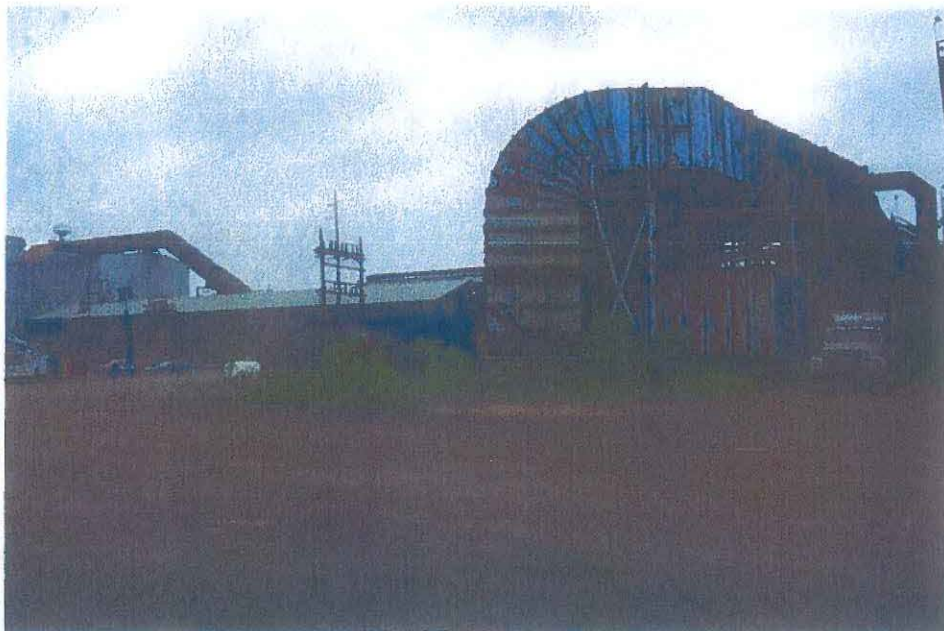
Roll-off box staged near baghouse. Dust that has been swept up from underneath auger system that conveys the 16 modules to the load-off point is added to the roll-off box. When pneumatic trailers have been filled beyond their legal weight limit the excess is vacuumed in to the roll-off box.



Another angle of the roll-off box showing the hose used to connect the roll-off box to the pneumatic trailer.



Lid tightly shut on roll-off box which is a "Hazardous Waste" container. WSH ships this wastestream to Michigan Disposal in Bellville, Michigan [MID 000 724 831]. Horsehead only accepts very fine material that is free of contamination.



Showing overhead conveyance from casting area in the background. The foreground shows the vacuum that pulls EAF dust to the baghouse. Once it is brought to this point it is then blown in to the baghouse and to the capture system created by all of the bags within each module.



Pile of sorted scrap metal waiting to be charged.



Scrap metal being loaded in to ladle. Phoenix is the scrap metal contractor.



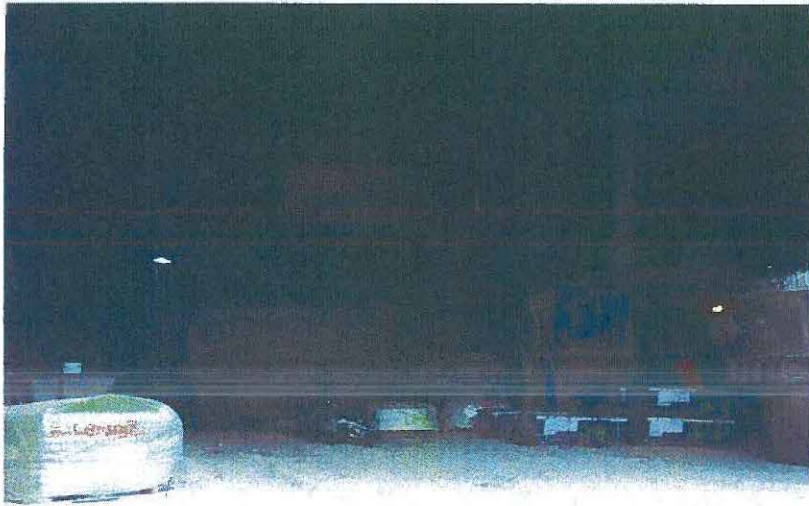
Scrap metal being loaded in ladle. WSH continuous casts using two charged ladles.



Another view of ladles staged ready to be charged during casting.



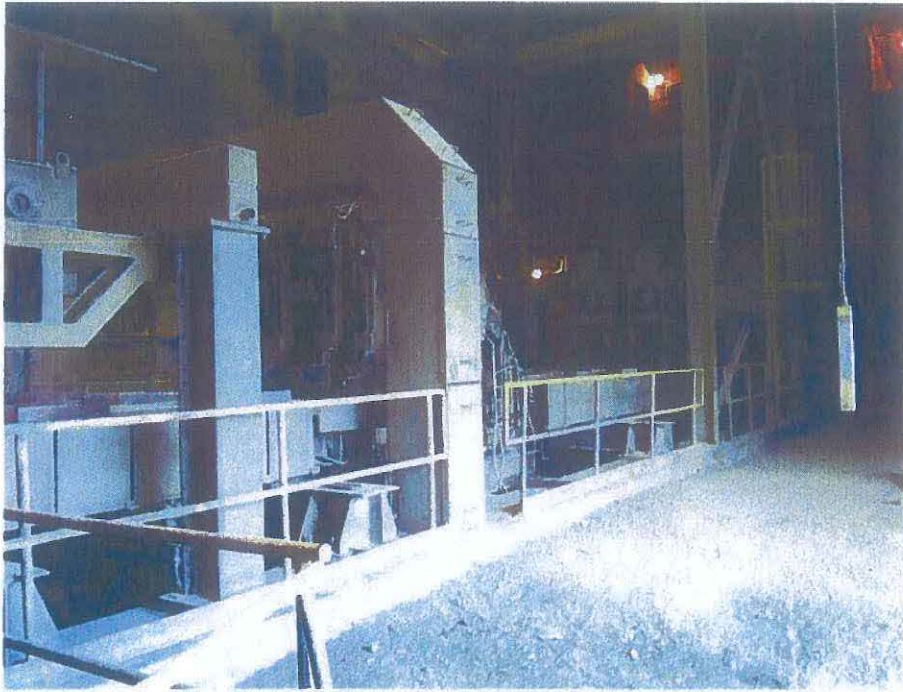
Ladle inside casting area.



Alloys and ingredients added during continuous casting.



Caster spray to cool cast as it rolls out. Water is recycled from wastewater treatment pond.



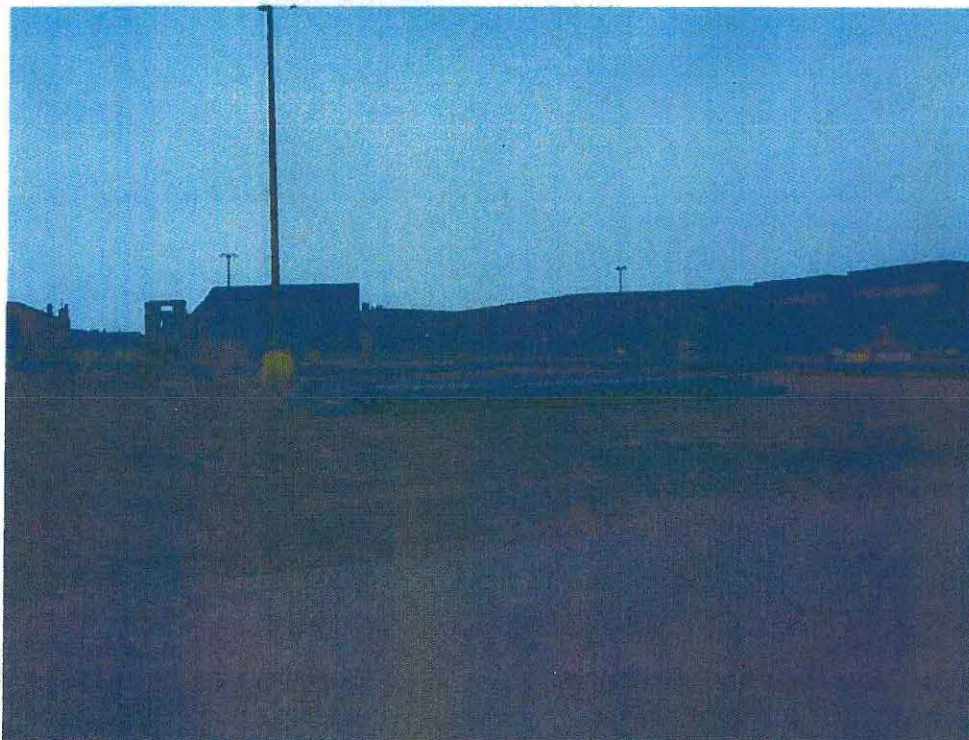
Rounds coming out from the cast after a pour. Ends are cut off and added to next pour.



Slag pile. Stein is the contractor who works with slag. Slag is sold as a product that is used added to salt for winter road conditions.



More slag.



Rounds (billits). WSH makes one product in different diameters and lengths.



Kinder Morgan is the contractor who manages rounds. All storage is outside. WSH prohibits entry in to old derelict buildings.



RE: Warren Steel Holdings LLC
Coder, Kris to: Duncan Campbell

07/07/2011 03:48 PM

Hi, Duncan, in short, I would look at the accumulation area as a <90 day area which is required to be inspected weekly. You are right in regard to the length of time the roll-off or transport container sits there. I wouldn't consider it a satellite area because they will exceed the 55 gallon limit very quickly as they begin to fill the transport container. We could be a little liberal with them in regard to how long the transport container(s) sits there. The other roll-off that was partially filled I would look at it as a 90 day area also. Hope this helps. I'll be back next week, about mid week if you want to talk more about it. Kris

-----Original Message-----

From: Duncan Campbell [mailto:Campbell.Duncan@epamail.epa.gov]
Sent: Thursday, July 07, 2011 1:24 PM
To: Coder, Kris
Subject: RE: Warren Steel Holdings LLC

Kris -

Brenda was helping with the string citations in the Notice of Violation --- for failure to conduct weekly inspections and failure to document them in a log or record. When we started working through it I thought it was very clean and straight-forward.

As I began to get deeper in to the explanation -- the whole scenario began to unwind on me and now I don't know what applies.

If they generate 3/4 of a trailer a day and the trucker hooks up to the trailer during the second day of filling ----- is the spot where the trailer is staged a "90-day accumulation area" or is it just one gigantic satellite container????????? Granted it probably exceeded the 55 gallons limit of a satellite within a few minutes of being hooked up to the conveyor. But even though it had exceeded 55 gallons immediately it would still have at least two more days before it exceeded the third day -- when it would have to be moved in to a 90-day accumulation area.

If the staging spot is a 90-day accumulation area ---- then maybe doing weekly inspections make sense --- even though waste only stays there for a little over a day. You would be doing inspections of the accumulation area more than you would be doing inspections of the waste itself -- because its already been shipped to Horsehead.

If the trailer that is staged and now hooked up to the conveyor is a satellite container ----- then the weekly inspection wouldn't apply to the trailer. I'm really confused.

The roll-off box is another issue --- do weekly inspections apply to the roll-off? I'm guessing yes --- partly because the roll-off is not hauled away on a daily basis like the trailer. If Ohio required secondary containment for 90-day areas then it may be more important.

DC



RE: Warren Steel Holdings LLC
Coder, Kris to: Duncan Campbell

07/07/2011 03:40 PM

Hi, Duncan, this pre-transport requirement applies to containers like 55 gallon drums. However, you are not wrong regarding hazardous waste labeling on roll-off containers as they sit at the site. These still need to be labeled with hazardous waste labels and have a date of accumulation. Hope this helps. Have a good weekend, Duncan. We are heading out to New York to see our kids and grandchild. Kris.

-----Original Message-----

From: Duncan Campbell [mailto:Campbell.Duncan@epamail.epa.gov]
Sent: Thursday, July 07, 2011 2:19 PM
To: Coder, Kris
Subject: RE: Warren Steel Holdings LLC

Kris --

Going through the checklist ---under the last section with the heading "Pre-transport requirements." Question #55 -- Does each container < 119 gallons have a completed hazardous waste label?

Does this mean that the roll-off and the trailer didn't need to have hazardous waste labels as I instructed them?????????

Chris Green started late in 2009

Susan Watkins
Ohio EPA
VAP program
330-963-1201

Ed Perez
OHIO EPA
NEDO
AIR Permitting & Compliance
330-963-1293

Rod Beals
Ohio EPA
DERR
330 963 1215



To: Chris Green <chris.green@warrensteelholdings.com>, Brian Greenwald
<bpgreenwald@horizonenv.com>
Cc:
Bcc:
Subject: Used oil

Starting my review and write-up. Used Oil -- stored in the Craft Shop ----- We didn't go to the Craft Shop did we???

Is the "Used Oil" stored in containers or a tank?? Does American Waste Management syphon the oil out of containers or physically remove the containers?

"Used Oil" is generated from performing maintenance on equipment --- such as gear boxes, _____??????????

Lagoon B --- I wrote down that you have not conducted oil skimming at this lagoon in several years. If this is correct then you do not generate used oil in a surface impoundment??????

Do you use oil as a dust suppressant?

Do you mix any solvent in with the oil?

Is off-spec oil burned for energy recovery?

Does your used oil contain more than 1,000ppm total halogens?

Stored in containers or tanks?

Fill pipes from underground tanks? If so, are they labeled "Used Oil?"

Have you had a release since WSH took over?

On-site burning in a space heater?

Does American Waste have an EPA ID#?



Warren Steel

Chris Green to: Duncan Campbell

Cc: "kris.coder@epa.state.oh.us", Brian Greenwald

07/13/2011 09:08 AM

1 attachment



Duncan Campbell questions_071211 use.doc

Duncan,

Sorry for the delay. I have attached a file that contains answers to your questions. I am still waiting for the analytical on the lime pile south of the bag house. Progress is being made to get that pile and the scrap pile beside it removed from site and properly disposed of. I will send you verification when that's been completed.

Chris Green
EHS Manager, R.S.O
Warren Steel Holdings
Cell: 330-979-2156
Office: 330-847-6119
Fax: 330-847-9130
chris.green@warrensteelholdings.com

Mr. Campbell,

I am responding to your emails from 7/6/2011 and 7/7/2011 pertaining to the management of used oils and universal waste at our facility. I have answered each question individually below. Feel free to contact me if you have any further questions.

1. Is used oil stored in the Craft Shop? Did we go to the Craft Shop?

- We did not go to the Craft Shop during your on-site visit. Warren Steel Holdings (WSH) generates a minimal amount of waste oil from our processes. When used oils are ready to be removed from the facility, the used oil drums are staged in the Craft Shop for pickup. During your site visit on June 16, 2011 there were no drums of used oil stored within the Craft Shop.

2. Used oil is generated from performing maintenance on equipment, such as gear boxes etc.

- Used oil is generated primarily from gear boxes during maintenance functions.

3. WSH has not conducted oil skimming in lagoon B in several years. Does WSH generate used oil in a surface impoundment?

- Lagoon B does not have an oil skimmer. Lagoon C currently has a belt skimmer for oil removal. WSH has not conducted oil skimming in lagoon C due to the fact that there has been no indication of oil in the lagoon to skim. WSH does not generate used oil in a surface impoundment.

4. Does WSH use oil as a dust suppressant?

- WSH does not use oil as a dust suppressant.

5. Does WSH mix any solvent in with the oil?

- WSH does not mix any solvents with any oil.

6. Is off-spec oil burned for energy recovery?

- No oils are burned for energy recovery on-site. Used oils are transported to a recycling facility where the oil is heated and the water in the oil is separated and treated. The recycled oil is subsequently sold as low grade oil.

7. Does your used oil contain more than 1,000 ppm total halogens?

- The oil that WSH uses does not contain more than 1,000 ppm of total halogens, and the WSH oil-containing processes (e.g., equipment gear boxes) do not introduce halogens into the used oil.

8. Is oil stored in containers or tanks?

- Oil is generally stored in containers (drums) and one bulk tank. The need for continued use of this tank is currently under evaluation by WSH.

9. Fill pipes from underground tanks?

- WSH does not utilize any underground tanks, nor is any oil transferred in underground pipes at WSH.

10. Since WSH has taken over, has there been a release?

- There has been no reportable release of used oil since WSH has taken over.

11. On-site burning in a space heater?

- No

12. Does American Waste Management have an EPA ID#?

- American Waste Management does not have an EPA ID number. They are strictly a waste brokering and management company, but do not actually transport or dispose of used oil for WSH.

13. Do you generate batteries? If so, do you manage them as universal waste?

- WSH does generate used batteries and they are managed as universal waste pursuant to Ohio Administrative Code 3745, Chapter 273, "Universal Waste Standards" (also 40 CFR Part 273) and taken off site by EnviroServe.

14. I've forgotten what you told me about mercury lamps and mercury containing equipment?????

- Fluorescent light bulbs/mercury lamps are also managed as universal waste and taken off site by EnviroServe.



WSH - Waste Profiles
Brian Greenwald to: Duncan Campbell
Cc: kris.coder, Chris Green

07/05/2011 08:14 AM

2 attachments



Warren Steel Mod I.PDF



KO61 Profile- EQ.pdf

Duncan -

I hope you had an enjoyable holiday weekend. Per your request, attached you will find copies of the current K061 profiles and acceptance materials for Warren Steel Holdings from both the Horsehead facility in Palmerton, PA and the EQ facility in Belleville, MI.

Chris reports that cleanup of materials in the loading auger shed commenced last week, and should be complete this week. He is also waiting for a mill production down day that will allow him to access the drop out box at the melt shop. He hopes to have photos of both the shed and the drop out box available to forward to you later this week.

Pepper Hamilton, WSH's outside legal counsel, began pulling files last week to review the deed information available regarding the property associated with WSH's purchase of the production areas at the Warren site. We are also hoping to compile this information to meet your request in the near future.

Please feel free to contact Chris or me if you have any further questions.

Regards,

--

Brian P. Greenwald, P.E.
Senior Project Engineer

4771 50th Street SE
Suite One
Grand Rapids, Michigan 49512
ph: 616.554.3210
fax: 616.554.3211

bpgreenwald@horizonenv.com

HORIZON ENVIRONMENTAL



Drop Out Box Determinations
Brian Greenwald to: Duncan Campbell
Cc: kris.coder, Chris Green

06/24/2011 11:21 AM

2 attachments



USEPA DOBox Determ_051701.pdf



OEPA DOBox Determ_061101.doc

Duncan -

Good speaking with you the other day. I'm forwarding over copies of two determinations regarding Drop Out Box material at EAF steel mills. The first is from USEPA Office of Solid Waste, while the second is the final version of the OEPA determination by Jeff Mayhugh that we discussed on Tuesday. These documents will be maintained in the WSH files to support our management of the Drop Out Box material as not a K061 waste.

We'll be back in touch soon with the other materials you requested, but feel free to contact Chris or I with any other questions.

Regards,

--

Brian P. Greenwald, P.E.
Senior Project Engineer

4771 50th Street SE
Suite One
Grand Rapids, Michigan 49512
ph: 616.554.3210
fax: 616.554.3211

bpgreenwald@horizonenv.com

HORIZON ENVIRONMENTAL



FW: Drop out box waste at electric arc furnace is not K061

Coder, Kris to: chris.green@warrensteelholdings.com,
Duncan Campbell

06/20/2011 08:43 AM

Cc: "Mayhugh, Jeff"

1 attachment



guerryk061.docx

Here is the attached information from Jeff Mayhugh regarding the "drop-out box slag". It has been determined not to be a listed K061. Hope this information helps. Jeff can provide a copy of his final letter if needed.

Kris Coder
Ohio EPA
DMWM
330-963-1266

From: Mayhugh, Jeff
Sent: Monday, June 20, 2011 9:24 AM
To: Coder, Kris
Subject: Drop out box waste at electric arc furnace is not K061

See attached letter I wrote and the feds letter at- I'll try to scare up a real copy of the letter I wrote if you need it.

[http://yosemite.epa.gov/osw/rcra.nsf/0c994248c239947e85256d090071175f/12C28296C889594C85256A9A0076ED6B/\\$file/14548.pdf](http://yosemite.epa.gov/osw/rcra.nsf/0c994248c239947e85256d090071175f/12C28296C889594C85256A9A0076ED6B/$file/14548.pdf)

COF PROPERTY ASSESSMENT CHECKLIST

PHASE I

10/20/06

Review Notes

Property: **Former Copperweld Steel NW Property** District: **NEDO**
AKA: American Steel and Alloys LLC; Warren Steel Holdings LLC; Copperweld Steel Corp.
4000 Mahoning Ave
Warren, OH 44483-1924
Trumbull County

33.7 acres, 1 parcels. Applicant: Champion Township. No development partner. Owned by Warren Steel Holdings (American Steel Alloys provided access??), since Nov 2001. Access provided thru agreement with American Steel Alloys. Deed and legal description appear to match plat map.

COF request: \$208,304 for Phase II Assessment

Proposed end use: Ohio Star Forge Co. (adjacent property), is a subsidiary of Daido Steel of Japan. They produce steel forgings for various automotive uses using high speed horizontal forging machines and began operating in 1989. They recently expanded with a 4th forging machine (\$11 million investment and 11 jobs). They are interested in purchasing adjacent property for future expansion. Phase I was funded by Ohio Star Forge Co.

VAP Eligibility

CP suspects property is eligible for VAP. Except for existing nat gas well and possible BUSTR requirements at former USTs.

Not on NPL.

No RCRA CA- no, TSD closure- no. ????

No BUSTR. ????

No Solid Waste issues

Oil & Gas issues - None

No UIC issues.

No Federal or State Enforcement Issues.

Phase I: February 2006 (URS, Mike McKim, VAP CP) Report evaluated approx 43 acres of NW portion of 500 acre Copperweld Plant. Focus of COAF Phase II is the 33 acre, NON Ohio Forge Portion of 43 acre NW portion.

Report - Complete (all sections available)

Maps - Complete

Historical Uses - Property was first developed in 1964 as the west thermal facility, processing specialty bar products. (Prior to 1964, area was used for product, intermediary and waste

material storage.) Operations included heat treating (nat. gas), steel quenching (oil and water) and bar straightening. Conditioning Bld 1 was used for crane repair, Conditioning Bldg 2 was used for steel bar storage. Remaining 500 acre Copperweld was established in 1939 as a steel bar mfg facility. Operations included steel making, hot rolling, bar pickling, and bar finishing. CSC ceased operations in March 2001. Warren Steel Holdings purchased in 2002 and has sold equipment and steel scrap from the property.

Currently: ????

Sanborn maps: No Sanborn Maps available.

City Directories - none available??

Historical Maps - none

Historic Photos -

Topo maps - evaluated.

1917- undeveloped

1960- mostly undeveloped, 2 oil AST, rail spurs. Seminole Paint Bldg north and off property.

CSC plant developed to the east and south.

1994 - west thermal property in present configuration. 3 ASTs in north, diff than previous 2.

Aerial photos (1960s): material storage, rail spurs. 2 AST northern portion. Route 5 to north of property was constructed in mid 1960s, Seminole Paint was demolished at that time.

Title search: Various individuals from 1852 to 1920. Realty Trust Co. to Youngstown Steel Co in 1924. YSC to American Puddled Iron in 1924. American Puddled Iron to Copperweld Steel in 1939. Warren Steel Holdings in 2001. Various Copperweld names: Copperweld Corp., Copperweld Specialty Steel Co., CSC Industries and Copperweld Steel Co., CSC Ltd.

Off-Property:

S- Former Copperweld plant, Mahoning River, and then residential

East - Copperweld plant since 1930s, Mahoning Ave, residential

West - Residential, undeveloped land, and small stream.

North - Route 5, recycling facility (non-ferrous metals), undeveloped land, residential.

Previous Investigations: URS completed site reconnaissance, file review, and limited Phase II for larger CSC property in 2001 for prospective purchaser. No formal Phase I and II reports prepared by URS.

BUSTR release, leak at dispensing line. Unknown location, but could be quench tank area.

ODH provided 1990 report from Oak Ridge Natl Lab for US DOE. Preliminary Evaluation related to straightening uranium rods from mid 1943 to 1945 for Manhattan Project. Potential FUSRAP site. Uranium processing occurred EAST of the project property. Screening indicated no radionuclide concentrations different from normal background levels in Ohio. This resulted

Known Releases- BUSTR release, Quench oil tank?

Property Inspection- November 2004, URS

Hazardous/Petroleum Raw Materials:

Quench oil - quench tank, 2 underground containers, and AST north of production area. UST have been abandoned, remedial actions to address oil release began in 2001. AST and associated oil/water separator and heat exchanger removed since May 2001.

Misc hydraulic, lube, used oil- no bulk containers observed, although likely used.

Fuel oil- 2 bulk AST were removed on north end of property between 1960 to 1970. 3 later bulk tanks were removed between 1990 and 2000.

Hazardous/Petroleum Wastes:

"No significant hazardous waste anticipated. No records of wastes or disposal were available."

UST/AST:

Quench Oil AST removed between 2001 and 2004. Bulk Fuel Oil AST - 1948: 1.5 MG and 0.42 MG tanks moved in 1970s for CSC expansion of current property. Third 1 MG bulk tank installed in 1974. All 3 bulk tanks removed in 1997. Closure documentation not produced by CSC.

Bulk oil tank station - east side of property along Quality Rd. Tanker trucks off-loaded fuel oil here for the 3 bulk tanks. No visible staining.

15K quench oil UST- temporarily closed in 1998. Permanent closure in Sept 2000. OEPA indicated action levels exceeded, CSC does Tier Assessment. An adjacent flow-thru UST was also abandoned. Assessment report: UST abandoned in place (instability to foundation and quench oil AST); 60 yds of contaminated soil removed; GW exceeded BUSTR action levels for benzene and B(a)P; free product in 2 of 3 MW; April 2001 indicated soil and gw outside backfill material meets BUSTR action levels; concluded UST impacts limited to backfill material. Nov 2004 and Jan 2006 site visits indicated free product remaining in standpipe associated with the quench oil UST.

AST storage in west yard - no longer present (2004/2006), visible staining, area reportedly had synthetic liner, but evidence of breach to liner.

Drums/Containers:

In 2001 URS identified drum storage area in yard west of West Thermal Bldg. Appeared to be waste material at the time. No longer present as of 2004/2006, visible staining in the area. Liner is present, but has been breached. Small containers remained throughout the W Thermal bldg.

PCB Equipment:

Numerous transformers, oil filled circuit breakers, and oil filled capacitors on property. CSC electrical engineer indicated CSC had diligent PCB removal policy, but only capacitors and a small # of transformers had PCB-free stickers. Significant staining in west yard transformer storage area, no PCB labels visible on transformers, again synthetic liner in area, but breached. Also, large pile of waste capacitors and small transformers present in western yard. Capacitors damaged with release of oil contents all had PCB free stickers.

in site being eliminated from FUSRAP.

Environmental History - Adequate database searches completed.

Adequate inquiries to regulating agencies was completed.

Potential releases suspected.

Off-property migration from adjacent property has limited potential for impact to property.

Property: Only database listing - Copperweld -entire facility: RCRA LQG, CORRACTS, DERR Database; MSL; SPILLS - fuel oil, low ph, quench oil, PCB, sulfuric acid; HISTLF - Flyash site, close CSC residual waste pile located about 2000 ft south of project property.

Off property: 5 SQG; 1 ERNS; 1 SWLF; 4 BUSTR UST; 13 LUST; DERR facility. SPILLS - Ohio Star Forge - 4 wastewater incidents in 2003, total solids issues that were resolved.

Off property issues: CSC facility. Electric Arc Furnace Baghouse (1600 ft downgradient), dust (haz waste) visible on skirt and gravel road around baghouse. Mill Rock Laydown Area (1600 ft downgradient) EAF dust was mixed with concrete for recharging to the furnace. Mill rock and slag was placed over 5 to 7 acres of CSC facility. Limited Phase II by URS indicated cd, cr, Pb at 10 X background in mill rock area. Oily Scale Mill - 3 storage pile areas, south of EAF baghouse, west of neutralizing bldg, along tracks west of acid neutralizing plant, one scale pile extends onto southern portion of Property. Acid Sump/Pickle Line/Pipeline. CSC acid sump and pickle sewer installed in 1943. Highly acid wastes pickle liquor and pickle rinsewater was conveyed to acid neutralizing plant until 1995 when plant closed. While sump was pumped it now remains full of water and integrity of sump is questionable. A 5 ft deep trench 40 ft west of pickler sump found low pH (2.0) in standing water in April 2001 by URS. Sewer passes 50 ft east of Property. Old Sludge Beds- acid sludge from pickle neutralization plant was discharged to beds located on CSC property, north of Mahoning River. No closure activity to beds. Located 1/2 mile downgradient of property. Groundwater Contamination- Blooming mill process water sewer had light-tan oil inside, also Lagoon A and D had visible oil present. CSC thinks rolling mill lub oil may be seeping into sewer system. Located 600 ft downgradient of Property.

File Reviews:

ODNR - ?

US EPA- no records.

Ohio EPA - ?

BUSTR- ?

EMA - no records

ODH- none

Fire Dept- no records

Interviews: County Health Dept. = petroleum release in 1989 from transfer line at UST.

Township Fire inspector= numerous fires, mainly at melt shop. Was historically a fire in one of the bulk oil AST north of the property. ODH had records of radiological study associated with uranium handling during WWII Manhattan Project on eastern portion of property.

Solid Waste:

Significant amounts of residual solid waste stored at the property, mainly in western yard (industrial solid waste such as grinding wheels, metallic scrap, motors, capacitors, waste concrete, general trash), southern yard had mill scale. Construction and demolition material present in north yard.

Floor drains:

Present inside building, but no staining nearby. Sump outside of oil quench tank contained free product. Sump is part of quench oil recycle system.

Wastewater/Stormwater:

Sanitary wastes were treated in small, inoperable package plant along southern edge of property which discharged to the CSC process WWTP. Disposition of contact quench water was not available. Storm water from W Thermal area is conveyed either to CSC WWTP or Ohio Star Forge Outfall 001, which discharges to Mahoning R.

Wells:

GW production well is located along eastern edge of property and provided process/potable water to the W Thermal plant.

Other evidence:

- Oil staining outside truck door adjacent to quench oil tank.
- Standing oil present underneath former straightening equipment located in W Thermal bldg
- Fine steel scale was present north of the W Thermal Bldg.

Potential ACM inside buildings.

2006 Identified Areas - 12 identified with potential COCs: metals (+uranium), TPH, PCB, VOC, SVOC, cyanide.

- 1) Former Bulk Oil AST area, (3 fm tanks, north)
- 2) Former Bulk Oil loading station (east)
- 3) Quench oil storage tanks
- 4) former Portable AST storage area - West Yard
- 5) former Drum Storage Area - west yard
- 6) transformer storage area - west yard
- 7) capacitor storage pile - west yard
- 8) misc residual waste piles - west yard and south yard
- 9) CSC pickle sump and sewer area - OFF Property to east (50 ft)
- 10) East Property line near Former Uranium Bar Processing Area - OFF Property
- 11) NE Property Boundary- near former Paint Mfg Facility, operated until 1960s when Rt 5 was constructed.
- 12) Underground Wastewater Sewer

De minimis areas - None

Phase II Statement of Work (Completed by Jim Smith, CP, Brownfield Restoration Group)

17 shallow (+2 contingent deep) monitoring wells: 17 shallow (up to 30' deep) and 2 deep (+ 100 ft + with possibly 40 ft of bedrock). One gw and two soil samples (at least one from 0-2') from each boring.

37 geoprobe borings (0-2' and one deeper sample) up to 25 ft deep.

30 shallow (0-2 ft) soil samples.

3 sediment and SW samples at Outfall 001.

4 Qtrs of GW data from at least 4 MW

Data Evaluation: data summary, maps, conceptual model, evaluate extent of contamination, exposure pathways.

Lab: 141 soil, 34 water samples.

VOC, SVOC, TPH, metals

8 geotechnical samples (K, grain size, atterberg limits, SG, bulk density, porosity, moisture, USGS)

IDW wastes

Phase II report.

Asbestos Survey???

Estimated Schedule: 30 weeks

Cost Estimate:

Drilling Services:	\$49,200	(Summit Drilling Co.) 4.25 auger = \$14/ft
Lab Analytical:	\$75,829	6.25 auger = \$16/ft
Geotech Testing:	\$ 2,664	Air rotary= \$25/ft
IDW:	\$ 9,500	Avg. \$2163 per MW (shal&deep)

Asbestos/Demolition Survey: \$ 0

Project Management/Field

Oversight/Data Eval/

Phase II report:	\$63,690
Project management	\$ 7,650
Field work/sampling	\$22,350
Data evaluation	\$17,200
Phase II Report	\$16,490

Equipment/Materials: \$ 3,990

Expenses (Milage/Misc.): \$ 3,526

TOTAL: \$208,304

BRG Rates:

CP = \$120/hr; Sr. Proj Manager = \$95/hr; Geologist = \$65/hr; Proj Administrator = \$35/hr

Draftperson = \$40/hr

EA Group

VOC soil/water = 72.00
16 VAP metals soil/waster = 70.00
PNA soil = 140.00
PNA water = 210.00
TPH (gro) and dro = 75.00
PCB = 45.00
Cyanide= 15.00

Potential Comments:

Asbestos survey?

Release history at Ohio Star Forge? Any IA that could impact Property? Forge almost bisects the property.



The Mixture / Derived - From Rules And Wastes Listed Solely for Ignitability, Reactivity, and/or Corrosivity

DHWM Guidance Document

DATE: July 2009

What is the purpose of this guidance?

This document is intended to help you understand the mixture and derived-from rules, including the exclusion under Ohio Administrative Code (OAC) rule 3745-51-03(G)(3).

What are the mixture and derived-from rules?

The mixture and derived-from rules define all wastes that originate from listed hazardous wastes (i.e., those wastes listed under OAC rules 3745-51-30 to 3745-51-35) as hazardous waste. The mixture rule is found at OAC rule 3745-51-03(A)(2)(e). The derived-from rule is found at OAC rule 3745-51-03(C)(2)(a). An exception to both of the rules is found in OAC rule 3745-51-03(G).

Under the mixture rule, if a waste is mixed with a listed hazardous waste, the mixture must be managed as the listed hazardous waste. Under the derived-from rule, any waste generated from the treatment, storage, or disposal of a listed hazardous waste remains regulated as a listed hazardous waste.

There is an exception for the mixture rule and the derived-from rule. If the listed waste is listed solely for ignitability, corrosivity, or reactivity, and either the waste mixture or the derivative waste does not exhibit any characteristic of hazardous waste, including TCLP toxicity, then the mixture or the derived-from waste is not a hazardous waste. If the waste exhibits the characteristic for TCLP toxicity, it is a characteristic hazardous waste that would carry the appropriate hazardous waste numbers (D004 through D043) but not the hazardous waste number for the listed waste.

Waste derived from the treatment, storage, or disposal of listed hazardous wastes include wastes such as sludges, ash, spill residues, and leachate generated from treatment, storage, or disposal of listed hazardous waste.

Note: Mixtures of the waste, materials derived from the waste that are listed solely for ignitability, corrosivity, or reactivity, and the as-generated waste are not listed waste when they do not exhibit a characteristic of ignitability, reactivity, and/or corrosivity; they are not hazardous waste as long as the waste does not exhibit any characteristic found in OAC rules 3745-51-21 through 3745-51-24.

NEDO, DMWM, Fieldnotes

Date of the inspection: June 16, 2011

Inspector(s):

Lead: Duncan Campbell (DC), U.S. EPA, Region 5, Environmental Protection Specialist, Land and Chemical Division, 77 W. Jackson Blvd., (LR-8J), Chicago, IL 60604-3511

Assist: Kris Coder (KC)

Facility Name: Warren Steel Holdings LLC. (WSHLLC) (Also onsite but not associated with them is Ohio Star Forge Co.)

Facility Address: 4000 Mahoning Avenue
Warren, OH 44483

Facility ID# (if applicable): OHR000007773

Facility Contacts: Chris Green (CG), Environmental, Health & Safety Manager; Terry Krebs (TK), Utilities, Scrap Procurement & Shipping Coordinator; Brian Greenwald (BG) (by telephone conference) Horizon Environmental, Grand Rapids, MI, 616-554-3210; Gene Ward, Baghouse Supervisor, Mark Trapp is Chief Operating Officer who we did not meet.

According to CG, the Owner is Optima located in Miami, FL

Allegations of the Complaint or purpose of the inspection: LQG, U.S. EPA lead

Samples Taken: Yes/No: no

Photographs Taken: Yes/No: DC took photos.

Findings: We arrived, signed in and received visitor badges. CG came forward. He has been here since July 2010. We drove to CG's office. WSHLLC makes carbon/steel billets which are also referred to as "rounds". The "rounds" are of different sizes and lengths. Scrap metal of various alloys is fed into the single Electric Arc Furnace. The metal then goes through the milling operation. The steel billets consist of a mix steel alloys per customer specifications. Some billets may contain chromium metal. They do no Pb heats according to CG. All steel has carbon which is added sometime during the process. The air pollution control equipment for the EAF generates a K061 listed HW. The drop out chamber or box generates a non-hazardous waste as determined by WSHLLC. This waste is shipped offsite to EQ, MI. U.S. EPA and Ohio EPA have determined that the drop out box waste is not a listed K061 (See file correspondence from Jeff Mayhugh, Ohio EPA and U.S. EPA.) WSHLLC also generates used oil which accumulates in drums in the Craft Shop. American Waste Management picks up the used oil.

The slag generated during the steel making process is managed on site by another company.

The following notes were recorded by KC as per discussions between BG and DC by telephone conference: BG has no knowledge of Ohio Star Forge which is located in the NW corner of the site. The lagoons across the road are WSHLLC's wastewater lagoons regulated under NPDES. West of that are the pickling lagoons and landfill which were not purchased by WSHLLC. In the SW corner is an old EAF dust landfill is under a Trust of Orphaned site overseen by OEPA. BG said he would e-mail DC a sketch and also provide a copy of the WSHLLC property boundaries. Susan Watkins is OEPA, NEDO contact for the Trust. BG described the WW Treatment system owned by WSHLLC which is as follows: sanitary treatment system consisting of sanitary and process wastes; the process wastes consists of caster spray, non-contact cooling, injector system, and storm water from the site; series of four lagoons (settling); following the lagoons is a chemical dosing system and then discharge. A portion of the lagoon water is returned to the plant for reuse. BG continued to discuss that two landfills are part of the trust overseen by Ohio EPA VAP representative, Susan Watkins (330) 963-1201. He said two summers ago Susan was on-site. A landfill currently exists on WSHLLC site which consist of rubbish or solid waste. Outside of the fenced area further west along the road is an EAF dust disposal area which did not transfer to WSHLLC. The pickling lagoons were also excised from WSHLLC's property. There is 100 foot berm or roadway that separates the current lagoons (B through D and the WWT facility) but there is no fence. DC asked if there are any Used Oil Tanks at the WW Lagoons? BG said there is an oil skimmer device at lagoon D but it is not running at this time. As far he knows the only used oil is from maintenance. There are no mercury switches since the operational mill was built in the early 80's. K061 is the only HW managed. DC asked about training records, manifests and contingency plan are they here onsite? Yes. DC asked, are there

NEDO, DMWM, Fieldnotes

submission of the plan to the locals? Not sure. BG has been working with the site folks for about two and a half years. DC asked them (BG and CG) to check their records for any mail receipts certifying that the locals had received a copy of their contingency plan. Are there weekly inspections? They respond by saying dust is generated quickly; three trailers are rotated in and out. They don't maintain empty trailers for the dust onsite. An offsite trucking firm moves the trailers. Do they have a waste profile of the K061? American Waste Management is the broker of the waste to Horsehead Palmerton, Pa. Toro Brothers is the trucking firm and they also pick up the solid refuse onsite. Wolford Trucking may also be involved. Copy of waste profile? Yes, Horsehead provides quarterly info. EQ takes the non-haz? Yes, BG said EQ once took the EAF dust. BG thinks the drop out box waste goes to EQ because Horsehead can't take this waste and process it. DC needs profile of the drop out box waste. The drop out box is cleaned once a week by the vac truck. Terry Krebs may be in charge. The box is cleaned out when there are no operations going on. They operate about 4-5 days a week.

About this time the call to BG ended and Terry Krebs joined us. TK oversees the water treatment plan, utilities, contact and non-contact cooling water; Clayton steam generators; pump house at the river (Mahoning). Cardinal Lab takes samples of the water when they discharge to the river. Ed Perez is the OEPA, NEDO, contact for air permitting and air compliance. Ed's telephone is (330) 963-1273. The consulting firm Fastway Inc. assists WSHLLC with the EAF Baghouse Dust Baghouse. According to TK the baghouse was tested on April 2 and 3, 2011 and it passed for CO, SO₂, and NO_x.

At about this time we left CG's office to drive to the Baghouse Dust collection area. Here we met Gene Ward. Mr. Ward helps manage the baghouse dust area and started here on April 3, 2006. He has a helper. Gene signs the manifests. TK and CG accompanied us. Noted here were one covered roll-off with a partial load of EAF dust; one vacuum truck and one transport trailer being loaded with EAF dust. According to Gene about 48000 lbs. of EAF goes off each day. According to Gene Odyssey is the transporter. None of the EAF containers had any HW marking, initially, but later, after returning to this area, it was noted the two containers were marked with a HW labels and dates of accumulation. The piles of unknown contents were noted. DC documented by photos the baghouse area and the unknown piles. According to Gene the operations for WSHLLC began in 2008. According to Gene sometime before 2008, the King Brothers pushed the piles. End of notes.

Klc: 06/16/2011



To: chris.green@warrensteelholdings.com,
Cc: "Coder, Kris" <kris.coder@epa.state.oh.us>
Bcc:
Subject: Re: FW: Drop out box waste at electric arc furnace is not K061

Chris --

As you can see Kris found the "interpretive letter" that we had discussed last Thursday. I encourage you to contact Jeff and preferably, get in writing that he still believes this to be accurate. The back story behind my suggestion is that U.S. EPA, Region 5 has taken a different position in Illinois in the past. I think you buy some additional protection from an adverse regulatory interpretation if you supply Jeff with some specific facts that apply to your present facility processes.

DC

"Coder, Kris"	Here is the attached information from Jeff...	06/20/2011 08:43:03 AM
---------------	---	------------------------

From: "Coder, Kris" <kris.coder@epa.state.oh.us>
To: "chris.green@warrensteelholdings.com" <chris.green@warrensteelholdings.com>, Duncan Campbell/R5/USEPA/US@EPA
Cc: "Mayhugh, Jeff" <jeff.mayhugh@epa.state.oh.us>
Date: 06/20/2011 08:43 AM
Subject: FW: Drop out box waste at electric arc furnace is not K061

Here is the attached information from Jeff Mayhugh regarding the "drop-out box slag". It has been determined not to be a listed K061. Hope this information helps. Jeff can provide a copy of his final letter if needed.

Kris Coder
Ohio EPA
DMWM
330-963-1266

From: Mayhugh, Jeff
Sent: Monday, June 20, 2011 9:24 AM
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Subject: Drop out box waste at electric arc furnace is not K061

See attached letter I wrote and the feds letter at- I'll try to scare up a real copy of the letter I wrote if you need it.

[http://yosemite.epa.gov/osw/rcra.nsf/0c994248c239947e85256d090071175f/12C28296C889594C85256A9A0076ED6B/\\$file/14548.pdf\[attachment "guerryk061.docx" deleted by Duncan Campbell/R5/USEPA/US\]](http://yosemite.epa.gov/osw/rcra.nsf/0c994248c239947e85256d090071175f/12C28296C889594C85256A9A0076ED6B/$file/14548.pdf[attachment%20%22guerryk061.docx%22%20deleted%20by%20Duncan%20Campbell/R5/USEPA/US])

Mixture/Derived-From Rules

How do I know if my listed hazardous waste is listed solely for an ignitability, reactivity, and/or corrosivity characteristic?

The list in the box to the right contains those listed "F", "K", and "U" hazardous waste which are listed solely for one or more of the hazardous waste characteristics of ignitability, reactivity, and/or corrosivity. An (I), (C), (R), (E), (H) and a (T) following the EPA hazardous waste number denotes ignitability, corrosivity, reactivity, toxicity characteristic waste, acute hazardous waste, and toxic waste. Listed "F", "K", or "U" hazardous wastes are listed in rules 3745-51-30 to 3745-51-35 of OAC. The basis for listing these wastes is identified by one or more of the following hazard codes:

- (I) Ignitable
- (C) Corrosive
- (R) Reactive
- (E) Toxicity Characteristic Waste
- (H) Acute Hazardous Waste
- (T) Toxic

Wastes that are listed "P" waste are acute hazardous waste for the most part. Some may only exhibit ignitability, corrosivity, or reactivity.

Examples

Example A

If you generate spill clean-up material as a result of spilling a drum of unused ethyl ether (U117), what hazardous waste code will you use to classify your clean-up material?

The **unused** ethyl ether that spilled is a commercial chemical product (CCP) and not a waste. Spilled, unusable ethyl ether and residues resulting from the cleaning of a spill of ethyl ether are listed hazardous waste having the waste code U117. U117 is listed solely for ignitability.

Any waste generated when the material is cleaned-up would not be a hazardous waste if it does not exhibit the characteristic of ignitability. Your waste evaluation must determine if the clean-up material exhibits any other characteristic (corrosivity, reactivity, or (TCLP) toxicity). If the waste generated when the material is cleaned-up no longer exhibits any characteristic of hazardous waste identified in rules 3745-51-20 to 3745-51-24 of the OAC, then it is not a hazardous waste. Land Disposal Restriction's (LDR's) apply to hazardous waste at the point of generation.

In the case of a spilled CCP that is cleaned up in a reasonable period of time, LDR's would not apply to clean up residues that are not hazardous waste.

All Chemicals Listed As:

F003 (I)
K044 (R)
K045 (R)
K047 (R)
U001 (I)
U002 (I)
U008 (I)
U020 (C, R)
U031 (I)
U055 (I)
U056 (I)
U057 (I)
U092 (I)
U096 (R)
U110 (I)
U112 (I)
U113 (I)
U117 (I)
U124 (I)
U125 (I)
U154 (I)
U161 (I)
U186 (I)
U189 (R)
U213 (I)
U239(I)
P009 (R)
P042 (R)
P081 (R)
P112 (R)

Mixture/Derived-From Rules

Example B

If you generate spill clean-up material as a result of a drum of spent ethyl ether spilling over, what hazardous waste code will you use to classify your clean-up material? Spent ethyl ether is F003 hazardous waste.

Spills or releases sometimes occur which involve wastes that are listed for only a characteristic. An absorbent material used to clean-up a spill of spent ethyl ether (F003 listed hazardous waste) which no longer exhibits the characteristic of ignitability is no longer considered to be a listed F003 hazardous waste. This is because the F003 hazardous waste is listed solely for the characteristic of ignitability. Although the waste may no longer carry the F003 listing, your waste evaluation must determine if the clean-up material exhibits any other characteristic (corrosivity, reactivity, or toxicity). If the waste no longer exhibits any characteristic of hazardous waste identified in rules 3745-51-20 to 3745-51-24 of the OAC, then it is no longer a hazardous waste.

LDR's apply at the point when the ethyl ether becomes spent. Concentration-based LDR treatment standards for F003 are found in OAC rule 3745-270-40. If the material meets the treatment level it may be disposed of as a non-hazardous waste. The concentration-based standards are found in OAC rule 3745-270-40.

Example C

If you mix a non-hazardous wastewater treatment sludge with a listed F005 hazardous waste, would the entire mixture be classified as a listed F005 hazardous waste?

Yes, the entire mixture would be classified as a listed F005 hazardous waste. F005 hazardous waste is listed for both ignitability and toxicity (not TCLP). It is not listed solely for the characteristic of ignitability, reactivity, or corrosivity.

Example D

If an incinerator generates incinerator ash from burning U154 (I), U186 (I), U161 (I), and U189 (R), would the ash carry those same "U" hazardous waste listings?

U154, U186, and U161 are hazardous waste listed solely for the characteristic of ignitability. U189 hazardous waste is listed solely for the characteristic of reactivity. If the ash no longer exhibits the characteristics for which the waste was listed - ignitability and reactivity, it won't carry any of those listed hazardous waste codes. However, if it exhibits the characteristic for toxicity under TCLP, it would carry the appropriate hazardous waste number (D004-D043). Incineration ash derived from the treatment of listed wastes that are not listed solely for ignitability, corrosivity, or reactivity will carry the appropriate hazardous waste number for those listed hazardous wastes.

Any hazardous waste listed in OAC rules 3745-51-30 to 3745-51-35 which is listed solely for the characteristic of ignitability, corrosivity, and/or reactivity is no longer a listed hazardous waste if it no longer exhibits any characteristic of hazardous waste as identified in OAC rules 3745-51-21 to 3745-51-24. A waste determination of whether the ash exhibits the hazardous waste characteristic of toxicity under OAC rule 3745-51-24 is required.

Mixture/Derived-From Rules

So, if the ash is hazardous for lead, will it also carry the "U" code?

The ash must be evaluated as a newly generated waste. If the ash exhibits the hazardous characteristic of toxicity for lead only, it would not carry the "U" code. It would be classified as D008 hazardous waste. Note that the wastes exempted under OAC rule 3745-51-03(G) remain subject to LDRs for the original hazardous wastes incinerated at the point of land disposal even if they no longer exhibit the listed characteristic [see OAC rule 3745-51-03(G)(3)].

December 6, 1999

Mr. John L. Wittenborn
Mr. William M. Guerry, Jr.
Counsel to the Steel Manufacturers Association and Special Steel Industry of North
America
Collier, Shannon, Rill & Scott, PLLC
Attorneys-at-Law
3050 K Street, N.W.
Suite 400
Washington, D.C. 20007

Dear Messrs. Wittenborn and Guerry:

My apologies for the time it has taken to reply to your letter dated 11/1/99 letter requesting a determination as to whether dropout box waste generated from electric arc furnaces (EAF's) is K061 listed hazardous waste. We have determined that dropout box (DOB) waste is not K061 listed hazardous waste based upon our review of the U.S. EPA Listing Background Document concerning electric arc furnace production of steel.

In the background document, EPA clearly defines subject waste as "emission control (dry) and "sludge" and "sludge" products from scrubbers. The document goes on to describe the general types of hazardous wastes as: "Dry collection methods generate a dust collection medium that generate a sludge." In addition, these wastes are described as "solidified particles that is entrained by hot gasses during the steel making process." The background document goes on to describe the listed wastes as those being "collected from the furnace off-gases by means of baghouse filters, electrostatic precipitator, or high energy Venturi scrubbers".

Your description of DOB waste as "rocks and chunks", similar to slag, that drop out near the furnace well before the baghouse or other control device, is clearly not one of the wastes that U.S. EPA examined and determined to be included in the K061 listing. The DOB waste is not even described in that document.

The term "sludge" was defined in the May 19, 1980 Federal Register as any solid waste generated from an industrial air pollution control facility, the

term sludge as used in the December 18, 1978 listing document is clearly intended to only be limited to those semi-solid waste generated from a scrubber system. In addition the listing itself describes K061 as the "dust/sludge" that is generated from electric arc furnaces. If U.S. EPA had intended the waste to include all wastes generated from FAF air pollution control devices they could have simply used the term "sludge".

Please be advised that while we do not consider the DOB waste to be a listed hazardous waste any person generating such a waste that is managed in Ohio must evaluate the waste to determine if it is hazardous for any of the characteristics of hazardous waste. From our experience with such wastes, we presume that they have the potential to be hazardous for the characteristic of toxicity for heavy metals.

If you have any more questions please contact me at (614) 644-9500.

Sincerely,

Jeffrey M. Mayhugh

June 11, 2001

Mr. John L. Wittenborn
Mr. William M. Guerry, Jr.
Collier, Shannon, and Scott
3050 K Street, N.W. Suite 400
Washington, D.C. 20007

Dear Messrs. Wittenborn and Guerry:

My apologies for the time it has taken to reply to your July 15, 1999, letter to Craig Butler requesting a determination as to whether dropout box (DOB) waste generated from electric arc furnaces (EAFs) is K061 listed hazardous waste. As you know we have engaged in discussions with U.S. EPA Region 5 and U.S. EPA Headquarters concerning the issue. U.S. EPA told you, in a May 17, 2001, letter that they believe DOB waste from EAFs is not K061 listed hazardous waste.

We also have determined that DOB waste is not K061 listed hazardous waste based upon our review of the U.S. EPA Listing Background Document concerning electric arc furnace production of steel.

In the background document U.S. EPA clearly describes the subject waste as "emission control dust" (dry) and "slurries or sludges" produced from scrubbers. The document goes on to describe the generation of K061 hazardous wastes as: "Dry collection methods generate a dust; wet collection methods generate a sludge." In addition, these wastes are described as "finely divided particulate" that is entrained by hot gasses during the steel making process. The background document goes on to describe the listed wastes as those being "removed from the furnace off-gases by means of baghouse filters, electrostatic precipitator, or high energy Venturi scrubbers." Your description of DOB waste as "large rocks and chunks," similar to slag, that drop out near the furnace well before the baghouse or other control device, is clearly not one of the wastes that U.S. EPA examined and determined to be included in the K061 listing. The DOB waste is not even described in that document.

Please be advised that while we do not consider the DOB waste to be a K061 listed hazardous waste, any person generating such a waste that is managed in Ohio must

Mr. John L. Wittenborn
Mr. William M. Guerry, Jr.
Collier, Shannon, and Scott
June 11, 2001
Page 2

evaluate that waste to determine if it is hazardous for any of the characteristics of hazardous waste. From our experience with such wastes, we presume that they have the potential to be hazardous for the characteristic of toxicity for heavy metals. In addition, if the DOB is mixed with K061, the entire resulting mixture would be considered K061 listed hazardous waste by virtue of the mixture rule [OAC rule 3745-51-03 (A)(2)(e)].

If you have any more questions, please contact me at (614) 644-2950.

Sincerely,

Jeffrey M. Mayhugh, Environmental Supervisor
Technical Support Unit
Division of Hazardous Waste Management

G:\USERS\MAYHUGH\LETTERS\2guerryko61.wpd

cc: Craig Butler, Director's Office
Pamela S. Allen, Manager, ITTSS
Dave Sholtis, Assistant Chief
CO/DO Managers and Supervisors



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
SOLID WASTE AND EMERGENCY
RESPONSE

May 17, 2001

Mr. William M. Guerry, Jr.
Collier, Shannon, and Scott
3050 K Street, NW, Suite 400
Washington, DC 20007

Dear Mr. Guerry:

This letter is in response to your April 26, 2000 request that EPA clarify that drop-out box slag (DOBS) generated at electric arc furnaces (EAFs) is not covered under EPA hazardous waste listing K061.

EPA has reviewed the information provided in the Steel Manufacturers Association (SMA) position paper and, based on the description of technology related to the production of DOBS provided by SMA, and after consultation with several States and EPA Regions, EPA has determined that the DOBS is not covered by the K061 listing. This is because the K061 listing consists of "[e]mission control dust/sludge from the primary production of steel in electric furnaces," and EPA has concluded that the DOBS does not meet this listing description. An explanation of this determination is provided below.

EAFs melt scrap metal generating significant amounts of gaseous fumes and particulates. The dust and fumes are captured in hoods some distance above the furnace and/or in a duct connected to the roof of the EAF, and are transported through several hundred feet of additional ductwork to one or more air emission control devices (baghouses or wet scrubbing devices).

The emission control devices are not designed to remove large chunks of solidified material that may be sucked into the duct connected to the EAF roof. While weight and density cause most of these chunks to fall back into the EAF, some of this material may enter this duct. Historically, this material clogged the ductwork leading to the air pollution control device, causing frequent shutdowns. As a result, the EAF industry developed the "drop-out box," a large chamber that allows the solidified material to fall out of the exhaust stream, separating it from the gases and particulate matter that continue through the ductwork to the air pollution control device.

The drop-out box creates an expansion that allows solidified material, made of lime and higher boiling-point metals, and pieces of scrap metal to be removed from the flow of particulate-laden gases that are intentionally drawn out of the furnace. The drop-out box operates at approximately 1,800°F, which allows the smaller-sized, lower boiling-point metals to continue to volatilize and to be pulled by suction to the air pollution control device.

The dust and sludge removed by the air pollution control system constitutes the K061 waste. The language of the K061 listing specifically refers to "dust" and "sludge" from the EAF emissions. The rulemaking record defines dust as the waste generated by dry collection methods and sludge as the waste generated by wet collection methods. See K061 Listing Background Document at 734. Because this listing differentiates between dust and sludge, the scope of the listing is different from the general regulatory definition of sludge, which is generally defined as "any solid, semi-solid, or liquid waste" generated from an air pollution control facility. See 40 CFR 260.10. Since the drop-out box material does not meet the description in the K061 listing, the drop put box material is not covered by the K061 listing.

Today's decision applies only to the material in the drop-out box itself, as described above. It does not apply to any material in the ductwork leading to or collected in the air pollution control device(s). As such, this decision does not cover issues in previous letters that deal with the management of emission control dust from EAFs.

While we do not consider the DOBS material to be a *listed* hazardous waste, since it is not a sludge within the meaning of the listing, it is still considered a "sludge" under the general regulatory definition in 40 CFR 260.10, which includes waste generated from air pollution control facilities. Furthermore, the DOBS material may exhibit the toxicity characteristic for various metals. Thus, a facility must determine whether or not the DOBS material is a characteristic hazardous waste under 40 CFR 261 Subpart C.

However, even if the DOBS material exhibits one or more characteristics, it is not a solid waste if sent for legitimate recycling in accordance with 40 CFR 261.2. Finally, States may have regulations that are more stringent than those of the Federal government. You (or your client) should always check with the applicable State agency to determine if other regulations apply.

Thank you for your inquiry. If you have any additional questions, please contact Mr. James Michael of my staff at 703-308-8610.

Sincerely,

Elizabeth Cotsworth, Director
Office of Solid Waste

cc: RCRA Senior Policy Advisors, Regions I - X
Betsy Devlin, OECA
James Michael, OSW
ASTSWMO



View a Site Identification Form



WARREN STEEL HOLDINGS LLC

WARREN

OHR000007773

National Shortcuts: General Information Reason Site ID and Name Location Land Type NAICS Mailing Contact Owner and Operator Waste Activity Haz. Wastes Certification

Last Updated By: PCE

Last Updated On: 10/01/2010 01:30:35

General Information

Received Date: *	02/24/2010	Non-notifier:	Select a Non-notifier.	Extract to Public? <input checked="" type="checkbox"/>
Accessibility:	Select an Accessibility.			Send Acknowledgement:

1. Reason for Submittal *

<input type="checkbox"/>	To provide an Initial Notification (first time submitting site identification information / to obtain an EPA ID Number for this location). [Source N]
<input checked="" type="checkbox"/>	To provide a Subsequent Notification (to update site identification information for this location). [Source N]
<input type="checkbox"/>	As a component of a First RCRA Hazardous Waste Part A Permit Application. [Source A]
<input type="checkbox"/>	As a component of a Revised RCRA Hazardous Waste Part A Permit Application. [Source A]
<input checked="" type="checkbox"/>	As a component of the Hazardous Waste Report. [Source R]
<input type="checkbox"/>	Implementer - Agency that is implementer of Record for Handler. [Source I]
<input type="checkbox"/>	Emergency. [Source E]
<input type="checkbox"/>	Temporary. [Source T]

2. Site ID

EPA ID: *	OHR000007773	Activity Location: *	OH
-----------	--------------	----------------------	----

3. Site Name

Name: *	WARREN STEEL HOLDINGS LLC
---------	---------------------------

4. Site Location (Physical address, not P.O. Box or Route)

Number:					
Street 1: *	4000 MAHONING AVE				
Street 2:					
City, Town or Village: *	WARREN	County: *	TRUMBULL		
State: *	OHIO	Country: *	UNITED STATES	Zip Code: *	44483
State District:	Districts are not available yet for this state				

5. Site Land Type

Land Type:	Private
------------	---------

6. North American Industry Classification System (NAICS) [Hint](#)

NAICS A:	331111 (Primary)	NAICS B:		NAICS C:		NAICS D:	
----------	---------------------	----------	--	----------	--	----------	--

7. Site Mailing Address

Number:							
Street 1:	4000 MAHONING AVE						
Street 2:							
City, Town or Village:	WARREN						
State:	OHIO		Country:	UNITED STATES		Zip Code:	44483

8. Site Contact Person

First Name:	STEPHEN	Middle Initial:	L	Last Name:	KAMYKOWSKI
Title:	EH&S MANAGER				

8a. Site Contact Address

Number:							
Street 1:	4000 MAHONING AVE						
Street 2:							
City, Town or Village:	WARREN						
State:	OHIO		Country:	UNITED STATES		Zip Code:	44483
Email Address:	STEPHEN.KAMYKOWSKI@WARRENSTEELHOLDINGS.COM						
Phone Number:	3308470487	Ext:		Fax:	3308479130		

9. Legal Owner and Operator [Hint](#)

A. Legal Owner Add Delete All Owners							
Seq.	Ind.	Type	Name	Address	Date Became Current	Date Ended Current	
1	CO	P	WARREN STEEL HOLDINGS, LLC	4000 MAHONING AVENUE WARREN OH 44483 US	11/30/2001		
B. Legal Operator Add Delete All Operators							
Seq.	Ind.	Type	Name	Address	Date Became Current	Date Ended Current	
2	CP	P	WARREN STEEL HOLDINGS, LLC	4000 MAHONING AVENUE WARREN OH 44483 US	11/30/2001		

10. Type of Federal Regulated Waste Activity

A. Hazardous Waste Activities (Complete all parts 1-7)	
1. Generator of Hazardous Waste (Federal)	2. Transporter of Hazardous Waste *

<input type="checkbox"/> 1 - Large Quantity Generator	<input type="checkbox"/> a. HW Transporter
	<input type="checkbox"/> b. HW Transfer Facility
Generator of Hazardous Waste (State)	<input type="checkbox"/> 3. Treater, Storer, or Disposer of Hazardous Waste <small>Note</small>
<input type="checkbox"/> 1 - Large Quantity Generator	<input type="checkbox"/> 4. Recycler of Hazardous Waste <small>Note</small>
	5. Exempt Boiler and / or Industrial Furnace
Indicate other generator activities (check all that apply).	<input type="checkbox"/> a. Small Quantity On-site Burner Exemption
<input type="checkbox"/> d. Short Term Generator <small>Note</small>	<input type="checkbox"/> b. Smelting, Melting, Refining Furnace Exemption
<input type="checkbox"/> e. United States Importer of Hazardous Waste	<input type="checkbox"/> 6. Underground Injection Control
<input type="checkbox"/> f. Mixed Waste (hazardous and radioactive) Generator	<input type="checkbox"/> 7. Receives Hazardous Waste from Off-site
B. Universal Waste Activities	C. Used Oil Activities
1. Large Quantity Handler of Universal Waste <small>Note</small>	1. Used Oil Transporter - Indicate types of activities.
Generated Accumulated/Managed	<input type="checkbox"/> a. Transporter
Batteries <input type="checkbox"/>	<input type="checkbox"/> b. Transfer Facility
Mercury containing equipment <input type="checkbox"/>	2. Used Oil Processor and / or Re-refiner - Indicate types of activities.
Lamps <input type="checkbox"/>	<input type="checkbox"/> a. Processor
Pesticides <input type="checkbox"/>	<input type="checkbox"/> b. Re-refiner
	<input type="checkbox"/> 3. Off-Specification Used Oil Burner
<input type="checkbox"/> 2. Destination Facility for Universal Waste <small>Note</small>	4. Used Oil Fuel Marketer - Indicate types of activities.
	<input type="checkbox"/> a. Marketer Who Directs Shipment of Off-Specification Used Oil to Off-Specification Used Oil Burner
	<input type="checkbox"/> b. Marketer Who First Claims the Used Oil Meets the Specifications
D. Eligible Academic Entities with Laboratories - Notification for opting into or withdrawing from managing laboratory hazardous wastes pursuant to 40 CFR Part 262 Subpart K. <small>Note</small>	
1. Opting into or currently operating under 40 CFR Part 262 Subpart K for the management of hazardous wastes in laboratories. <small>Note</small>	
<input type="checkbox"/> a. College or University	
<input type="checkbox"/> b. Teaching Hospital that is owned by or has a formal written affiliation agreement with a college or university.	
<input type="checkbox"/> c. Non-profit institute that is owned by or has a formal written affiliation agreement with a college or university.	
<input type="checkbox"/> 2. Withdrawing from 40 CFR Part 262 Subpart K for the management of hazardous wastes in laboratories.	
E. State Activities	
<input type="checkbox"/>	CINR - COMPLAINT INVESTIGATION - NOT RCRA-REGULATED
<input type="checkbox"/>	CSFB - COMPARABLE/SYNGAS FUEL BURNER
<input type="checkbox"/>	CSFG - COMPARABLE/SYNGAS FUEL GENERATOR
<input type="checkbox"/>	RCY72 - 72-Hour Recycler
<input type="checkbox"/>	SOHUW - SMALL QUANTITY HANDLER OF UNIVERSAL WASTE
<input type="checkbox"/>	UOCC - USED OIL COLLECTION CENTER
<input type="checkbox"/>	UOG - USED OIL GENERATOR

11. Description of Hazardous Waste Hint

Dropdown Size: 5

Type D Select All / Remove All	Type F Select All / Remove All	Type K Select All / Remove All	Type P Select All / Remove All	Type U Select All / Remove All	Type X Select All / Remove All
D001 D002 D003 D004 D005 D006 D007 D008 D009 D010	F001 F002 F003 F004 F005 F006 F007 F008 F009 F010	K001 K002 K003 K004 K005 K006 K007 K008 K009 K010	LABP P001 P002 P003 P004 P005 P006 P007 P008 P009	U001 U002 U003 U004 U005 U006 U007 U008 U009 U010	
Total D Selected: 0	Total F Selected: 0	Total K Selected: 1	Total P Selected: 0	Total U Selected: 0	Total X Selected: 0

12. Notification of Hazardous Secondary Material (HSM) Activity

<input type="checkbox"/>	Are you notifying under 40 CFR 260.42 that you will begin managing, are managing, or will stop managing hazardous secondary material under 40 CFR 261.2(a)(ii), 40 CFR 261.4(a)(23),(24), or (25)?
--------------------------	--

13. Comments [Clear Notes](#)

Chars Remaining 3366

Initial waste characterization analysis categorized this waste as K061, electric arc furnace exhaust emission control dust. There has been no changes to the process since the waste was initially characterized. Some shipments this year were incorrectly labeled as D008 on the manifest, but there is no reason to believe that the waste has changed (i.e., that there is lead in the waste stream that would leach at sufficient levels to requiring labeling and management as

14. Certification[Hint Read the certification.](#)

First Name:	M.I.:	Last Name:	Title:	Date Signed:
RONALD		BIDULA	PLANT MANAGER	02/24/2010

Navigational Shortcuts: [General Information](#) [Reason](#) [Site ID and Name](#) [Location](#) [Land Type](#) [NAICS](#) [Mailing](#) [Contact](#) [Owner and Operator](#) [Waste Activity](#) [Haz. Wastes](#) [Certification](#)[Back to the Handler Main Menu](#)

URL: /rcrainfo/handler/siteidmntn.jsp

RCRA Site Detail

Report run on: June 7, 2011 - 4:37 PM

Version 5.0

User Selection Criteria

Handler EPA ID: OHR000007773

History: All records

BR Cycles: Show all

Results

Data meeting the criteria you selected follows.

Total Pages: 13

Report Description

The RCRA Site Detail report provides "all available details" from the handler module and summarized information from the waste activity monitoring module for one RCRA site. The report integrates National Biennial RCRA Hazardous Waste Report data with Site Identification data.

Details reported about the RCRA site include basic handler module information; the standard suite of universes; information about each source record received for the facility, including basic information, location and mailing address, source record and permit contact person (including historical records), list of NAICS codes, complete list of regulated waste activities; and summarized National Biennial RCRA Hazardous Waste Report information by reporting cycle year, including quantity totals (generated, managed, shipped, received), and top ten GM forms by quantity generated. Top ten GM form list shows reported waste description, quantities, onsite and offsite system types, and EPA and State waste codes.

Information listed for the RCRA site can be limited by latest historical information and most recent BR cycle.

Data is sorted by the most recent Received Date. If more than one record has the same Received Date, the data is sorted by Source Type (I-Implementer; N-Notification, B-Biennial Report with Subsequent Notification, R-Biennial Report, A-Part A, T-Temporary, E-Emergency).

Report Information

Name: h_site_detail.rdf
Developed by: EPA Headquarters, Office of Resource Conservation and Recovery
Deployed: November 2002
Last Revised: April 2011
Contact: rcrainfo.help@epa.gov
Tables Used: hbasic, hreport_univ5, gis4, gis_lat_long4, lu_generator_status, hother_id5, hpart_a5, hhandler5, lu_generator_status, lu_country, howner_operator5, hnaics5, lu_naics, hstate_activity5, lu_state_activity, hother_permit5, lu_other_permit, huniversal_waste5, lu_universal_waste, hwaste_code5, bgm_basic, bgm_onsite_treatment, bgm_offsite_shipment, bgm_waste_code, lu_management_method, lu_state, hid_groups, hhsm_basic5, hhsm_activity5, hhsm_waste_code5

NOTE: Some data is suppressed if it is null or blank. See documentation in RCRAInfo Help for details.

RCRA Site Detail

Report run on: June 7, 2011 - 4:37 PM

Page 2

List of Hazardous Waste Code Descriptions

Please run the lookup table report for LU_WASTE_CODES for description of federal and state waste codes in this report.

List of Handler Universe Abbreviations

Active	Active Status -- Indicates that the facility could be subject to the federal RCRA, Subtitle C, or a state's authorized hazardous waste program. This definition has no legally enforceable or binding determination about the status of a particular site or the obligations of an owner or operator.
Commercial TSDF	Commercial TSDF -- Indicates that the facility is a commercial operator of treating, storing and disposing of hazardous waste.
EI Indicator (HE/GW)	Environmental Indicator (Human Exposure/Groundwater Release) -- Indicates that the facility has controls in place for Environmental Indicators. HE - Human Exposures ('+' indicates the exposure exists and is under control; '-' indicates the exposure exists and is not under control; 'N' indicates the exposure does not exist). GW - Groundwater Release ('+' indicates the exposure exists and is under control; '-' indicates the exposure exists and is not under control; 'N' indicates the exposure does not exist).
Federal Generator	Federal Generator Status -- Indicates the regulatory status of the site as determined by the quantity and/or toxicity of hazardous wastes generated, stored or accumulated over a specified period of time.
HSM	HSM -- Indicates that the facility manages hazardous secondary material(s) (e.g. spent material, by-product or sludge) that when discarded, would be identified as hazardous waste.
IC In Place	Institutional Controls in Place -- Indicates that the facility has Institutional Controls in place ('Y' indicates that the facility is in the universe).
Importer	Importer -- Indicates that the facility imports hazardous waste into the United States from a foreign country.
Mixed Waste Generator	Mixed Waste Generator -- Indicates that the facility is a generator or TSDF that handles waste mixed with nuclear source, special nuclear or by-product material.
Operating TSDF	Operating TSDF -- Indicates that the facility is a Treatment, Storage or Disposal facility subject to any type of enforcement. It then specifies the type of facility (L - Land Disposal; I - Incinerator; B - BIF; S - Storage; T - Treatment).
Short Term Generator	Short Term Generator -- Indicates that the facility is a short term or one time event generator and not generating from ongoing processes.
State Generator	State Generator Status -- Indicates the regulatory status of the site in view of implementing the State's "broader in scope" or "more stringent than" rules. Although an implementing State might use terms that differ for their generators these terms would be translated to match the Federal regulatory term.
Transporter	Transporter -- Indicates that the facility is engaged in the off-site transportation of hazardous waste. ('Y' indicates that the facility is in this universe).

RCRA Site Detail

Report run on: June 7, 2011 - 4:37 PM

Page 3

RRREN STEEL HOLDINGS LLC

OHR000007773

Region:05 Extract:Y County: TRUMBULL

State District: NE

Universes	Federal Generator:	LQG	Transporter:	N	Operating TSDF:----	Active:	Y	
	State Generator:	1	Importer:	N	Commercial:	N	El Indicator (HE / GW): N / N	
	Short Term Generator:	N	Mixed Waste Generator:	N	HSM:	N	IC In Place:	N

Latitude/Longitude Measure - Owner: Seq #:

Coordinates:

Receive Date: 02/24/2010

Source Type: Biennial Rpt w/Notification

Seq. Number: 3

Report Cycle: 2009

Location 4000 MAHONING AVE
Address: WARREN, OH 44483

Mailing 4000 MAHONING AVE
Address: WARREN, OH 44483
UNITED STATES

RCRA Site Detail

Report run on: June 7, 2011 - 4:37 PM

Page 4

Receive Date: 02/24/2010	Source Type: Biennial Rpt w/Notification	Seq. Number: 3	Report Cycle: 2009
--------------------------	--	----------------	--------------------

Contact Person	STEPHEN L. KAMYKOWSKI
For Source	EH&S MANAGER
Information	(330) 847-0487
	STEPHEN.KAMYKOWSKI@WARRENSTEELHOLDINGS.COM
	Fax: (330) 847-9130

RCRA Site Detail

Report run on: June 7, 2011 - 4:37 PM

Page 5

ive Date: 02/24/2010 Source Type: Biennial Rpt w/Notification Seq. Number: 3 Report Cycle: 2009

4000 MAHONING AVE
WARREN, OH 44483
UNITED STATES

Owner (current)
WARREN STEEL HOLDINGS, LLC
From: 11/30/2001 To: 4000 MAHONING AVENUE
WARREN, OH 44483
WARREN
Type: Private
Phone: (330) 847-0487

Operator (current)
WARREN STEEL HOLDINGS, LLC
From: 11/30/2001 To: 4000 MAHONING AVENUE
WARREN, OH 44483
WARREN
Type: Private
Phone: (330) 847-0487

Land Type: Private Non Notifier: No TSD Date: Accessibility:

NAICS Codes: 331111 IRON AND STEEL MILLS

Notes: Initial waste characterization analysis categorized this waste as K061, electric arc furnace exhaust emission control dust. There has been no changes to the process since the waste was initially characterized. Some shipments this year were incorrectly labeled as D008 on the manifest, but there is no reason to believe that the waste has changed (i.e., that there is lead in the waste stream that would leach at sufficient levels to requiring labeling and management as D008 waste). The generated electric arc furnace exhaust emission control dust was consistently handled as K061 waste for shipment and at the management facility.

Regulated Waste Activities

Hazardous Waste Generator Status - Federal: Large Quantity Generator; State: OH-1 Large Quantity Generator

Other Hazardous Waste Generator Activities

Short Term Generator: No
Importer Activity: No
Mixed Waste Generator: No
Transporter Activity: No
Transfer Facility: No
TSD Activity: No
Recycler Activity: No
Exempt Boiler and/or Industrial Furnace
Small Quantity Onsite Burner Exemption: No
Smelting, Melting, Refining Furnace Exemption: No

Used Oil Activities

Used Oil Transporter Activity	Off-Specification Used Oil Burner:	No
Transporter: No	Used Oil Fuel Marketer Activity	
Transfer Facility: No	Marketer who directs shipment off-specification used oil to off-specification used oil burner:	No
Used Oil Processor and/or Re-refiner Activity	Marketer who first claims the used oil meets the specifications:	No
Processor: No		
Refiner: No		
Subpart K		
College/University: No	Non-profit Research Institute:	No
Teaching Hospital: No	Withdrawal:	No

Description of Hazardous Wastes (as reported on Site Identification Form)

EPA Waste Codes: K061

2009 Biennial Report Information

[Click Here for Biennial Report Detail](#)

Total Quantity Reported (Tons): Generated: 242 Managed: 0 Shipped: 242 Received: 0

Top 10 GM Forms Summary by Largest Quantity of Hazardous Waste Generated (All quantities are in tons)

Generated	Managed	On-site Management Methods	Shipped	Off-site Management Methods
110	0		110	H010 - METALS RECOVERY

EPA Waste Codes: K061

RCRA Site Detail

Report run on: June 7, 2011 - 4:37 PM

Page 6

Receive Date: 02/27/2009 Source Type: Biennial Rpt w/Notification Seq. Number: 2 Report Cycle: 2008

Location 4000 MAHONING AVE Address: WARREN, OH 44483	Mailing 4000 MAHONING AVE Address: WARREN, OH 44483 UNITED STATES
---	---

Contact Person STEPHEN L. KAMYKOWSKI
For Source (330) 847-0487
Information STEPHEN.KAMYKOWSKI@WARRENSTEELHOLDINGS.COM

Owner (current) WARREN STEEL HOLDINGS, LLC From: 11/30/2001 To:	4000 MAHONING AVENUE WARREN, OH 44483 WARREN	Type: Private Phone:
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Operator (current) WARREN STEEL HOLDINGS, LLC From: 11/30/2001 To:	4000 MAHONING AVENUE WARREN, OH 44483 WARREN	Type: Private Phone:
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Land Type: Private	Non Notifier: No	TSD Date:	Accessibility:
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NAICS Codes: 331111 IRON AND STEEL MILLS

Regulated Waste Activities

Hazardous Waste Generator Status - Federal: Large Quantity Generator; State: OH-1 Large Quantity Generator

Other Hazardous Waste Generator Activities

Short Term Generator:	No
Importer Activity:	No
Mixed Waste Generator:	No
Transporter Activity:	No
Transfer Facility:	No
TSD Activity:	No
Recycler Activity:	No
Exempt Boiler and/or Industrial Furnace	
Small Quantity Onsite Burner Exemption:	No
Smelting, Melting, Refining Furnace Exemption:	No
Underground Injection Control:	No
Destination Facility for Universal Waste:	No

Used Oil Activities

Used Oil Transporter Activity	Off-Specification Used Oil Burner:	No
Transporter:	Used Oil Fuel Marketer Activity	
Transfer Facility:	Marketer who directs shipment off-specification used oil to off-specification used oil burner:	No
Used Oil Processor and/or Re-refiner Activity	Marketer who first claims the used oil meets the specifications:	No
Processor:		
Refiner:		
Subpart K		
College/University:	Non-profit Research Institute:	No
Teaching Hospital:	Withdrawal:	No

2008 Biennial Report Information [Click Here for Biennial Report Detail](#)

No Biennial Report detail information available.

RCRA Site Detail

Report run on: June 7, 2011 - 4:37 PM

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Effective Date: 03/03/2008	Source Type: Biennial Rpt w/Notification	Seq. Number: 1	Report Cycle: 2007
Location: 4000 MAHONING AVENUE Address: WARREN, OH 44483		Mailing Address: 4000 MAHONING AVENUE WARREN, OH 44483 UNITED STATES	

Contact Person: STEPHEN L. KAMYKOWSKI
For Source Information: (330) 847-0487

Owner (current) WARREN STEEL HOLDINGS, LLC From: 11/30/2001 To:	4000 MAHONING AVENUE WARREN, OH 44483 WARREN	Type: Private Phone:
Operator (current) WARREN STEEL HOLDINGS, LLC From: 11/30/2001 To:	4000 MAHONING AVENUE WARREN, OH 44483 WARREN	Type: Private Phone:
Land Type: Private	Non Notifier: No	TSD Date: Accessibility:

NAICS Codes: 31111 ANIMAL FOOD MANUFACTURING

Regulated Waste Activities

Hazardous Waste Generator Status - Federal: Large Quantity Generator; State: OH-1 Large Quantity Generator

Other Hazardous Waste Generator Activities

Short Term Generator:	No
Importer Activity:	No
Mixed Waste Generator:	No
Transporter Activity:	No
Transfer Facility:	No
TSD Activity:	No
Recycler Activity:	No
Exempt Boiler and/or Industrial Furnace	
Small Quantity Onsite Burner Exemption:	No
Smelting, Melting, Refining Furnace Exemption:	No
Underground Injection Control:	No
Destination Facility for Universal Waste:	No

Used Oil Activities

Used Oil Transporter Activity	No	Off-Specification Used Oil Burner:	No
Transporter:	No	Used Oil Fuel Marketer Activity	
Transfer Facility:	No	Marketer who directs shipment off-specification used oil to off-specification used oil burner:	No
Used Oil Processor and/or Re-refiner Activity		Marketer who first claims the used oil meets the specifications:	No
Processor:	No		
Refiner:	No		
Subpart K			
College/University:	No	Non-profit Research Institute:	No
Teaching Hospital:	No	Withdrawal:	No

2007 Biennial Report Information

[Click Here for Biennial Report Detail](#)

Total Quantity Reported (Tons): Generated: 247 Managed: 0 Shipped: 247 Received: 0

Top 10 GM Forms Summary by Largest Quantity of Hazardous Waste Generated (All quantities are in tons)

Generated	Managed	On-site Management Methods	Shipped	Off-site Management Methods
0	0	WASTE FLAMMABLE STODDARD SOLVENT	0	H061 - FUEL BLENDING
EPA Waste Codes: D001				
0	0	FLAMMABLE PETROLEUM DISTILLATE	0	H061 - FUEL BLENDING
EPA Waste Codes: D001				
0	0	CRUSHED FLUORESCENT LIGHT BULBS	0	H141 - STORAGE, BULKING AND/OR TRANSFER OFF SITE
EPA Waste Codes: D009				

RCRA Site Detail

Report run on: June 7, 2011 - 4:37 PM

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Receive Date: 06/18/2007		Source Type: Notification		Seq. Number: 3	
Location 4000 MAHONING AVE NW Address: WARREN, OH 44483			Mailing 4000 MAHONING AVE NW Address: WARREN, OH 44483 UNITED STATES		
Contact Person HOPE M. DROPP For Source (330) 847-6904 Information HOPE.DROPP@WARRENSTEELHOLDINGS.COM		4000 MAHONING AVE NW WARREN, OH 44483 UNITED STATES			
Owner (current) WARREN STEEL HOLDINGS LLC From: 11/30/2001 To:		4000 MAHONING AVE NW WARREN, OH 44483 WARREN		Type: Private Phone: (330) 847-0487	
Operator (current) WARREN STEEL HOLDINGS LLC From: 11/30/2001 To:		4000 MAHONING AVE NW WARREN, OH 44483 WARREN		Type: Private Phone: (330) 847-0487	
Land Type: Private		Non Notifier: No		TSD Date:	
Accessibility:					
NAICS Codes: 331111 IRON AND STEEL MILLS					
Notes: THIS FORM IS BEING SUBMITTED BECAUSE OF A CHANGE IN HAZARDOUS WASTES.					
Regulated Waste Activities					
Hazardous Waste Generator Status - Federal: Large Quantity Generator, State: OH-1 Large Quantity Generator					
Other Hazardous Waste Generator Activities					
Short Term Generator:		No			
Importer Activity:		No			
Mixed Waste Generator:		No			
Transporter Activity:		No			
Transfer Facility:		No			
TSD Activity:		No			
Recycler Activity:		No			
Exempt Boiler and/or Industrial Furnace					
Small Quantity Onsite Burner Exemption:		No			
Smelting, Melting, Refining Furnace Exemption:		No			
Underground Injection Control:		No			
Destination Facility for Universal Waste:		No			
Used Oil Activities					
Used Oil Transporter Activity		Off-Specification Used Oil Burner:		No	
Transporter:		No			
Transfer Facility:		No			
Used Oil Processor and/or Re-refiner Activity		Used Oil Fuel Marketer Activity			
Processor:		Marketer who directs shipment off-specification used oil to off-specification used oil burner:		No	
Refiner:		No			
Marketer who first claims the used oil meets the specifications:		No			
Subpart K					
College/University:		No		Non-profit Research Institute:	
Teaching Hospital:		No		Withdrawal:	
				No	
Description of Hazardous Wastes (as reported on Site Identification Form)					
EPA Waste Codes: D001 D009 K061					

RCRA Site Detail

Report run on: June 7, 2011 - 4:37 PM

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Effective Date: 03/23/2007		Source Type: Notification		Seq. Number: 2	
Location 4000 MAHONING AVE NW Address: WARREN, OH 44483			Mailing Address: 4000 MAHONING AVE NW WARREN, OH 44483 UNITED STATES		
Contact Person HOPE M. DROPP For Source (330) 847-6904 Information HOPE.DROPP@WARRENSTEELHOLDINGS.COM		4000 MAHONING AVE NW WARREN, OH 44483 UNITED STATES			
Owner (current) WARREN STEEL HOLDINGS LLC From: 11/30/2001 To:		4000 MAHONING AVE NW WARREN, OH 44483 WARREN		Type: Private Phone: (330) 847-0487	
Operator (current) WARREN STEEL HOLDINGS LLC From: 11/30/2001 To:		4000 MAHONING AVE NW WARREN, OH 44483 WARREN		Type: Private Phone: (330) 847-0487	
Land Type: Private		Non Notifier: No		TSD Date:	
				Accessibility:	
NAICS Codes: 331111 IRON AND STEEL MILLS					
Notes: THIS IS A NAME AND OWNERSHIP CHANGE, FORMERLY CSC.					
Regulated Waste Activities					
Hazardous Waste Generator Status - Federal: Large Quantity Generator; State: OH-1 Large Quantity Generator					
Other Hazardous Waste Generator Activities					
Short Term Generator:		No		Used Oil Activities	
Importer Activity:		No		Used Oil Transporter Activity	
Mixed Waste Generator:		No		Off-Specification Used Oil Burner:	
Transporter Activity:		No		No	
Transfer Facility:		No		Used Oil Fuel Marketer Activity	
TSD Activity:		No		Marketer who directs shipment off-specification used oil to off-specification used oil burner:	
Recycler Activity:		No		No	
Exempt Boiler and/or Industrial Furnace				Marketer who first claims the used oil meets the specifications:	
Small Quantity Onsite Burner Exemption:		No		No	
Smelting, Melting, Refining Furnace Exemption:		No			
Underground Injection Control:		No		Subpart K	
Destination Facility for Universal Waste:		No		College/University:	
				Teaching Hospital:	
				Non-profit Research Institute:	
				Withdrawal:	
				No	
				No	
Description of Hazardous Wastes (as reported on Site Identification Form)					
EPA Waste Codes: K061					

RCRA Site Detail

Report run on: June 7, 2011 - 4:37 PM

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Receive Date: 02/29/2000 Source Type: Biennial Report Seq. Number: 3 Report Cycle: 1999

Other/Previous Site Name: CSC LTD

Location 4000 MAHONING AVE NW
Address: WARREN, OH 44483

Mailing 4000 MAHONING AVE NW
Address: WARREN, OH 44483

Contact Person TERRY BYRNE
For Source (330) 841-6713
Information

Land Type: Bad code - U Non Notifier: No TSD Date: Accessibility:

NAICS Codes: 331111 IRON AND STEEL MILLS

Notes: ARTIST CONVERSION:

Regulated Waste Activities

Hazardous Waste Generator Status - Federal: Large Quantity Generator; State:

Other Hazardous Waste Generator Activities

Short Term Generator:	No
Importer Activity:	No
Mixed Waste Generator:	No
Transporter Activity:	No
Transfer Facility:	No
TSD Activity:	No
Recycler Activity:	No
Exempt Boiler and/or Industrial Furnace	
Small Quantity Onsite Burner Exemption:	No
Smelting, Melting, Refining Furnace Exemption:	No
Underground Injection Control:	No
Destination Facility for Universal Waste:	No

Used Oil Activities

Used Oil Transporter Activity	Off-Specification Used Oil Burner:	No
Transporter:	No	
Transfer Facility:	No	
Used Oil Processor and/or Re-refiner Activity	Used Oil Fuel Marketer Activity	
Processor:	Marketer who directs shipment off-specification used oil to off-specification used oil burner:	No
Refiner:	No	
	Marketer who first claims the used oil meets the specifications:	No
Subpart K		
College/University:	No	Non-profit Research Institute:
Teaching Hospital:	No	Withdrawal:
		No

1999 Biennial Report Information

No Biennial Report detail information available.

RCRA Site Detail

Report run on: June 7, 2011 - 4:37 PM

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Effective Date: 02/26/1998 Source Type: Biennial Report Seq. Number: 2 Report Cycle: 1997

Previous Site Name: CSC LTD

Location 4000 MAHONING AVE NW
Address: WARREN, OH 44483

Mailing 4000 MAHONING AVE NW
Address: WARREN, OH 44483

Contact Person JACK VAN KIRK
For Source (330) 841-6789
Information

Land Type: Bad code - U Non Notifier: No TSD Date: Accessibility:

NAICS Codes: 331111 IRON AND STEEL MILLS

Regulated Waste Activities

Hazardous Waste Generator Status - Federal: Large Quantity Generator; State:

Other Hazardous Waste Generator Activities

Short Term Generator: No
Importer Activity: No
Mixed Waste Generator: No

Transporter Activity: No

Transfer Facility: No

TSD Activity: No

Recycler Activity: No

Exempt Boiler and/or Industrial Furnace

Small Quantity Onsite Burner Exemption: No

Smelting, Melting, Refining Furnace
Exemption: No

Underground Injection Control: No

Destination Facility for Universal Waste: No

Used Oil Activities

Used Oil Transporter Activity Off-Specification Used Oil Burner: No

Transporter: No

Transfer Facility: No

Used Oil Processor and/or
Re-refiner Activity

Processor: No

Refiner: No

Used Oil Fuel Marketer Activity

Marketer who directs shipment
off-specification used oil to
off-specification used oil burner: No

Marketer who first claims the used
oil meets the specifications: No

Subpart K

College/University: No Non-profit Research Institute: No

Teaching Hospital: No Withdrawal: No

1997 Biennial Report Information

No Biennial Report detail information available.

RCRA Site Detail

Report run on: June 7, 2011 - 4:37 PM

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Receive Date: 02/29/1996	Source Type: Biennial Report	Seq. Number: 1	Report Cycle: 1995
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Other/Previous Site Name: CSC LTD

Location Address: 4000 MAHONING AVE NW WARREN, OH 44483	Mailing Address: 4000 MAHONING AVE NW WARREN, OH 44483
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Contact Person JACK VAN KIRK
For Source (216) 841-6557
Information

Land Type: Bad code - U	Non Notifier: No	TSD Date:	Accessibility:
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NAICS Codes: 331111 IRON AND STEEL MILLS

Regulated Waste Activities

Hazardous Waste Generator Status - Federal: Large Quantity Generator; State:

Other Hazardous Waste Generator Activities

Short Term Generator: No
Importer Activity: No
Mixed Waste Generator: No

Transporter Activity: No

Transfer Facility: No

TSD Activity: No

Recycler Activity: No

Exempt Boiler and/or Industrial Furnace

Small Quantity Onsite Burner Exemption: No

Smelting, Melting, Refining Furnace

Exemption: No

Underground Injection Control: No

Destination Facility for Universal Waste: No

Used Oil Activities

Used Oil Transporter Activity Off-Specification Used Oil Burner: No

Transporter: No
Transfer Facility: No

Used Oil Fuel Marketer Activity
Marketer who directs shipment
off-specification used oil to
off-specification used oil burner: No

Used Oil Processor and/or
Re-refiner Activity
Processor: No
Refiner: No

Marketer who first claims the used
oil meets the specifications: No

Subpart K

College/University: No Non-profit Research Institute: No

Teaching Hospital: No Withdrawal: No

1995 Biennial Report Information

No Biennial Report detail information available.

RCRA Site Detail

Report run on: June 7, 2011 - 4:37 PM

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ive Date: 10/18/1995 Source Type: Notification Seq. Number: 1

Previous Site Name: CSC LTD

Location 4000 MAHONING AVE NW
Address: WARREN, OH 44483

Mailing 4000 MAHONING AVE NW
Address: WARREN, OH 44483

Contact Person JACK VANKIRK 4000 MAHONING AVE NW
For Source (216) 841-8557 WARREN, OH 44483
Information UNITED STATES

Owner (current) 4000 MAHONING AVE NW Type: Private
CSC LTD WARREN, OH 44483 Phone: (216) 841-6011
From: To:

Land Type: Private Non Notifier: No TSD Date: Accessibility:

Regulated Waste Activities

Hazardous Waste Generator Status - Federal: Large Quantity Generator; State:

Other Hazardous Waste Generator Activities

Short Term Generator: No
Importer Activity: No
Mixed Waste Generator: No
Transporter Activity: No
Transfer Facility: No
TSD Activity: No
Recycler Activity: No

Exempt Boiler and/or Industrial Furnace

Small Quantity Onsite Burner Exemption: No
Smelting, Melting, Refining Furnace
Exemption: No

Underground Injection Control: No
Destination Facility for Universal Waste: No

Used Oil Activities

Used Oil Transporter Activity Off-Specification Used Oil Burner: No
Transporter: No
Transfer Facility: No
Used Oil Processor and/or
Re-refiner Activity
Processor: No
Refiner: No
Marketer who directs shipment
off-specification used oil to
off-specification used oil burner: No
Marketer who first claims the used
oil meets the specifications: No

Subpart K

College/University: No Non-profit Research Institute: No
Teaching Hospital: No Withdrawal: No

Description of Hazardous Wastes (as reported on Site Identification Form)

EPA Waste Codes: D000 D001 D006 D008 D018 D035 D039 D040 K061 K062

* End of Report *

RCRA Site Detail

Report run on: June 7, 2011 - 4:37 PM

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Effective Date: 03/03/2008	Source Type: Biennial Rpt w/Notification	Seq. Number: 1	Report Cycle: 2007
Location: 4000 MAHONING AVENUE Address: WARREN, OH 44483		Mailing Address: 4000 MAHONING AVENUE WARREN, OH 44483 UNITED STATES	

Contact Person: STEPHEN L. KAMYKOWSKI
For Source Information: (330) 847-0487

Owner (current) WARREN STEEL HOLDINGS, LLC From: 11/30/2001 To:	4000 MAHONING AVENUE WARREN, OH 44483 WARREN	Type: Private Phone:
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Operator (current) WARREN STEEL HOLDINGS, LLC From: 11/30/2001 To:	4000 MAHONING AVENUE WARREN, OH 44483 WARREN	Type: Private Phone:
--	--	-------------------------

Land Type: Private	Non Notifier: No	TSD Date:	Accessibility:
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NAICS Codes: 31111 ANIMAL FOOD MANUFACTURING

Regulated Waste Activities

Hazardous Waste Generator Status - Federal: Large Quantity Generator; State: OH-1 Large Quantity Generator

Other Hazardous Waste Generator Activities		Used Oil Activities	
Short Term Generator:	No	Used Oil Transporter Activity	Off-Specification Used Oil Burner: No
Importer Activity:	No	Transporter:	No
Mixed Waste Generator:	No	Transfer Facility:	No
Transporter Activity:	No	Used Oil Processor and/or Re-refiner Activity	Used Oil Fuel Marketer Activity
Transfer Facility:	No		Marketer who directs shipment off-specification used oil to off-specification used oil burner: No
TSD Activity:	No	Processor:	No
Recycler Activity:	No	Refiner:	No
Exempt Boiler and/or Industrial Furnace	No	Marketer who first claims the used oil meets the specifications:	No
Small Quantity Onsite Burner Exemption:	No	Subpart K	
Smelting, Melting, Refining Furnace Exemption:	No	College/University:	No
Underground Injection Control:	No	Teaching Hospital:	No
Destination Facility for Universal Waste:	No	Non-profit Research Institute:	No
		Withdrawal:	No

2007 Biennial Report Information [Click Here for Biennial Report Detail](#)

Total Quantity Reported (Tons): Generated: 247 Managed: 0 Shipped: 247 Received: 0

Top 10 GM Forms Summary by Largest Quantity of Hazardous Waste Generated (All quantities are in tons)				
Generated	Managed	On-site Management Methods	Shipped	Off-site Management Methods
WASTE FLAMMABLE STODDARD SOLVENT:				
0	0		0	H061 - FUEL BLENDING
EPA Waste Codes: D001				
FLAMMABLE PETROLEUM DISTILLATE				
0	0		0	H061 - FUEL BLENDING
EPA Waste Codes: D001				
CRUSHED FLUORESCENT LIGHT BULBS				
0	0		0	H141 - STORAGE, BULKING AND/OR TRANSFER OFF SITE
EPA Waste Codes: D009				

RCRA Site Detail

Report run on: June 7, 2011 - 4:37 PM

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Receive Date: 06/18/2007 Source Type: Notification Seq. Number: 3

Location 4000 MAHONING AVE NW Address: WARREN, OH 44483	Mailing Address: 4000 MAHONING AVE NW WARREN, OH 44483 UNITED STATES
--	---

Contact Person HOPE M. DROPP
For Source (330) 847-6904
Information HOPE.DROPP@WARRENSTEELHOLDINGS.COM

4000 MAHONING AVE NW
 WARREN, OH 44483
 UNITED STATES

Owner (current) 4000 MAHONING AVE NW Type: Private
 WARREN STEEL HOLDINGS LLC WARREN, OH 44483
 From: 11/30/2001 To: WARREN Phone: (330) 847-0487

Operator (current) 4000 MAHONING AVE NW Type: Private
 WARREN STEEL HOLDINGS LLC WARREN, OH 44483
 From: 11/30/2001 To: WARREN Phone: (330) 847-0487

Land Type: Private Non Notifier: No TSD Date: Accessibility:

NAICS Codes: 331111 IRON AND STEEL MILLS

Notes: THIS FORM IS BEING SUBMITTED BECAUSE OF A CHANGE IN HAZARDOUS WASTES.

Regulated Waste Activities

Hazardous Waste Generator Status - Federal: Large Quantity Generator; State: OH-1 Large Quantity Generator

Other Hazardous Waste Generator Activities

Short Term Generator: No
 Importer Activity: No
 Mixed Waste Generator: No

Transporter Activity: No
 Transfer Facility: No
 TSD Activity: No
 Recycler Activity: No

Exempt Boiler and/or Industrial Furnace

Small Quantity Onsite Burner Exemption: No
 Smelting, Melting, Refining Furnace Exemption: No

Underground Injection Control: No
 Destination Facility for Universal Waste: No

Used Oil Activities

Used Oil Transporter Activity Off-Specification Used Oil Burner: No
 Transporter: No
 Transfer Facility: No

Used Oil Processor and/or Re-refiner Activity
 Processor: No
 Refiner: No

Used Oil Fuel Marketer Activity
 Marketer who directs shipment off-specification used oil to off-specification used oil burner: No

Marketer who first claims the used oil meets the specifications: No

Subpart K

College/University: No
 Teaching Hospital: No

Non-profit Research Institute: No
 Withdrawal: No

Description of Hazardous Wastes (as reported on Site Identification Form)

EPA Waste Codes: D001 D009 K061

RCRA Site Detail

Report run on: June 7, 2011 - 4:37 PM

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Effective Date: 03/23/2007		Source Type: Notification		Seq. Number: 2																																									
Location 4000 MAHONING AVE NW Address: WARREN, OH 44483			Mailing 4000 MAHONING AVE NW Address: WARREN, OH 44483 UNITED STATES																																										
Contact Person HOPE M. DROPP For Source (330) 847-6904 Information HOPE.DROPP@WARRENSTEELHOLDINGS.COM		4000 MAHONING AVE NW WARREN, OH 44483 UNITED STATES																																											
Owner (current) WARREN STEEL HOLDINGS LLC From: 11/30/2001 To:		4000 MAHONING AVE NW WARREN, OH 44483 WARREN		Type: Private Phone: (330) 847-0487																																									
Operator (current) WARREN STEEL HOLDINGS LLC From: 11/30/2001 To:		4000 MAHONING AVE NW WARREN, OH 44483 WARREN		Type: Private Phone: (330) 847-0487																																									
Land Type: Private		Non Notifier: No		TSD Date:																																									
Accessibility:																																													
NAICS Codes: 331111 IRON AND STEEL MILLS																																													
Notes: THIS IS A NAME AND OWNERSHIP CHANGE, FORMERLY CSC.																																													
Regulated Waste Activities																																													
Hazardous Waste Generator Status - Federal: Large Quantity Generator; State: OH-1 Large Quantity Generator																																													
Other Hazardous Waste Generator Activities																																													
Short Term Generator:	No	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td colspan="4">Used Oil Activities</td> </tr> <tr> <td>Used Oil Transporter Activity</td> <td></td> <td>Off-Specification Used Oil Burner:</td> <td>No</td> </tr> <tr> <td>Transporter:</td> <td>No</td> <td>Used Oil Fuel Marketer Activity</td> <td></td> </tr> <tr> <td>Transfer Facility:</td> <td>No</td> <td>Marketer who directs shipment off-specification used oil to off-specification used oil burner:</td> <td>No</td> </tr> <tr> <td>Used Oil Processor and/or Re-refiner Activity</td> <td></td> <td>Marketer who first claims the used oil meets the specifications:</td> <td>No</td> </tr> <tr> <td>Processor:</td> <td>No</td> <td colspan="2"></td> </tr> <tr> <td>Refiner:</td> <td>No</td> <td colspan="2"></td> </tr> <tr> <td colspan="4">Subpart K</td> </tr> <tr> <td>College/University:</td> <td>No</td> <td>Non-profit Research Institute:</td> <td>No</td> </tr> <tr> <td>Teaching Hospital:</td> <td>No</td> <td>Withdrawal:</td> <td>No</td> </tr> </table>				Used Oil Activities				Used Oil Transporter Activity		Off-Specification Used Oil Burner:	No	Transporter:	No	Used Oil Fuel Marketer Activity		Transfer Facility:	No	Marketer who directs shipment off-specification used oil to off-specification used oil burner:	No	Used Oil Processor and/or Re-refiner Activity		Marketer who first claims the used oil meets the specifications:	No	Processor:	No			Refiner:	No			Subpart K				College/University:	No	Non-profit Research Institute:	No	Teaching Hospital:	No	Withdrawal:	No
Used Oil Activities																																													
Used Oil Transporter Activity						Off-Specification Used Oil Burner:	No																																						
Transporter:	No					Used Oil Fuel Marketer Activity																																							
Transfer Facility:	No	Marketer who directs shipment off-specification used oil to off-specification used oil burner:	No																																										
Used Oil Processor and/or Re-refiner Activity		Marketer who first claims the used oil meets the specifications:	No																																										
Processor:	No																																												
Refiner:	No																																												
Subpart K																																													
College/University:	No	Non-profit Research Institute:	No																																										
Teaching Hospital:	No	Withdrawal:	No																																										
Mixed Waste Generator:	No																																												
Transporter Activity:	No																																												
Transfer Facility:	No																																												
TSD Activity:	No																																												
Recycler Activity:	No																																												
Exempt Boiler and/or Industrial Furnace																																													
Small Quantity Onsite Burner Exemption:	No																																												
Smelting, Melting, Refining Furnace Exemption:	No																																												
Underground Injection Control:	No																																												
Destination Facility for Universal Waste:	No																																												
Description of Hazardous Wastes (as reported on Site Identification Form)																																													
EPA Waste Codes: K061																																													

RCRA Site Detail

Report run on: June 7, 2011 - 4:37 PM

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Receive Date: 02/29/2000 Source Type: Biennial Report Seq. Number: 3 Report Cycle: 1999

Other/Previous Site Name: CSC LTD

Location 4000 MAHONING AVE NW
Address: WARREN, OH 44483

Mailing 4000 MAHONING AVE NW
Address: WARREN, OH 44483

Contact Person TERRY BYRNE
For Source Information (330) 841-6713

Land Type: Bad code - U Non Notifier: No TSD Date: Accessibility:

NAICS Codes: 331111 IRON AND STEEL MILLS

Notes: ARTIST CONVERSION:

Regulated Waste Activities

Hazardous Waste Generator Status - Federal: Large Quantity Generator; State:

Other Hazardous Waste Generator Activities

Short Term Generator: No
Importer Activity: No
Mixed Waste Generator: No

Transporter Activity: No

Transfer Facility: No

TSD Activity: No

Recycler Activity: No

Exempt Boiler and/or Industrial Furnace

Small Quantity Onsite Burner Exemption: No
Smelting, Melting, Refining Furnace Exemption: No

Underground Injection Control: No

Destination Facility for Universal Waste: No

Used Oil Activities

Used Oil Transporter Activity Off-Specification Used Oil Burner: No

Transporter: No
Transfer Facility: No

Used Oil Processor and/or Re-refiner Activity
Marketer who directs shipment off-specification used oil to off-specification used oil burner: No

Processor: No
Refiner: No

Marketer who first claims the used oil meets the specifications: No

Subpart K

College/University: No
Teaching Hospital: No

Non-profit Research Institute: No
Withdrawal: No

1999 Biennial Report Information

No Biennial Report detail information available.



Enforcement & Compliance History Online (ECHO)

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Detailed Facility Report

Report
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Dictionary

For Public Release - Unrestricted Dissemination Report Generated on 06/07/2011
US Environmental Protection Agency - Office of Enforcement and Compliance Assurance

Gray text in this report indicates information that is not required to be reported to EPA. These data, typically regarding non-major or smaller facilities, are often incomplete.

Facility Permits and Identifiers

Data Dictionary

Statute	System	Source ID	Facility Name	Street Address	City	State	Zip
	FRS	110000389865	WARREN STEEL HOLDINGS LLC	4000 MAHONING AVENUE	WARREN	OH	44483
CAA	AFS	3915500004	CSC, LIMITED	4000 MAHONING AVENUE, N.W.	WARREN	OH	44483
CWA	ICP	OH0011207	CSC IND INC COPPERWELD STEEL C	4000 MAHONING AVE	WARREN	OH	44483
CWA	ICP	OH0133094	OHIO STAR FORGE CO	4000 MAHONING AVENUE	WARREN	OH	44482
RCRA	RCR	OHD061731857	COPPERWELD STEEL CO	4085 MAHONING AVE	WARREN	OH	44482
RCRA	RCR	OHR000007773	WARREN STEEL HOLDINGS LLC	4000 MAHONING AVE	WARREN	OH	44483
EP313	TRI	44482CPPRW4000M	WARREN STEEL HOLDINGS LLC	4000 MAHONING AVE	WARREN	OH	44483
EP313	TRI	44482HSTRF4MAHN	OHIO STAR FORGE CO	4000 MAHONING AVE	WARREN	OH	44483

Facility Characteristics

Data Dictionary

Statute	Source ID	Universe	Status	Areas	Permit Expiration Date	Latitude/ Longitude	Indian Country?	SIC Codes	NAICS Codes
	110000389865					LRT: 41.271429 , -80.839373	No		
CAA	3915500004	Minor (Fed. Rep.)	Operating	TITLE V PERMITS , SIP , NSPS			NA	3312	331111
CWA	OH0011207	Major; NPDES Individual Permit	EFF		01/31/2012	41.272361, -80.845444	No	3312	
CWA	OH0133094	Minor; NPDES Individual Permit	EFF		05/31/2015	41.274111, -80.856389	No	9999	
RCRA	OHD061731857	LQG	Active (H)				No	3312	
RCRA	OHR000007773	LQG	Active (H)				No		331111
EP313	44482CPPRW4000M					41.2736 , -80.8561	NA	3462	331111

If the CWA permit is past its expiration date, this normally means that the permitting authority has not yet issued a new permit. In these situations, the expired permit is normally administratively extended and kept in effect until the new permit is issued.

For the RCRA program, activities that contribute to an overall facility status of Active are displayed in parentheses using the acronym HPACS, where H indicates handler activities, P - permitting, A - corrective action, C - converter, and S - state-specific. More information is available in the Data Dictionary.

Inspection and Enforcement Summary Data

Data Dictionary

Statute	Source ID	Insp. Last 05Yrs	Date of Last Inspection	Formal Enf Act Last 05 Yrs	Penalties Last 05 Yrs
CAA	3915500004	0	09/13/2000	0	\$00
CWA	OH0011207	2	03/25/2010	0	\$00
CWA	OH0133094	1	10/01/2009	0	\$00
RCRA	OHD061731857	0	07/05/2001	0	\$00
RCRA	OHR000007773	0	06/01/1998	0	\$00

Compliance Monitoring History (05 years)

Data Dictionary

Statute	Source ID	System	Inspection Type	Lead Agency	Date	Finding
CAA	3915500004	AFS	STATE PCE/ON-SITE	State	07/19/2008	
CAA	3915500004	AFS	OWNER/OPERATOR-CONDUCTED SOURCE TEST	State	07/19/2008	Result=STACK TEST FAILED ; Pollutant=PT
CAA	3915500004	AFS	EPA PCE/ON-SITE	EPA	10/23/2007	
CAA	3915500004	AFS	EPA PCE/ON-SITE	EPA	10/05/2008	
CWA	OH0011207	ICP	Evaluation (CEI); NPDES - Base Program	State	11/13/2007	
CWA	OH0011207	ICP	Evaluation (CEI); NPDES - Base Program	State	03/25/2010	
CWA	OH0133094	ICP	Evaluation (CEI); NPDES - Base Program	State	10/01/2009	

Entries in *italics* are not considered inspections in official counts.

Compliance Summary Data

[Data Dictionary](#)

Information on the nature of [alleged violations](#) is available on the FAQ page.

Statute	Source ID	Current SNC/HPV?	Description	Current As Of	Qtrs in NC (of 12)
CAA	3915500004	YES	VIOLATION UNADDRESSED; EPA HAS LEAD ENFORCEMENT	04/16/2011	10
CWA	OH0011207	NO		Oct-Dec10	10
CWA	OH0133094	N/A		Oct-Dec10	9
RCRA	OHD061731857	No		04/19/2011	12
RCRA	OHR000007773	No		04/19/2011	0

Three Year Compliance Status by Quarter

[Data Dictionary](#)

Violations shown in a given quarter do not necessarily span the entire 3 months. Information on the nature of [alleged violations](#) is available on the FAQ page, and information on the duration of non-compliance is available at the end of this report.

AIR Compliance Status												
Statute:Source ID CAA: 3915500004	QTR1 Apr- Jun08	QTR2 Jul- Sep08	QTR3 Oct- Dec08	QTR4 Jan- Mar09	QTR5 Apr- Jun09	QTR6 Jul-Sep09	QTR7 Oct- Dec09	QTR8 Jan- Mar10	QTR9 Apr- Jun10	QTR10 Jul-Sep10	QTR11 Oct- Dec10	QTR12 Jan- Mar11
HPV History			Unaddr- EPA	Unaddr- EPA	Unaddr- EPA	Unaddr- EPA	Unaddr- EPA	Unaddr- EPA	Unaddr- EPA	Unaddr- EPA	Unaddr- EPA	Unaddr- EPA
Program/Pollutant in Current Violation												
TITLE V PERMITS	Unknown	Unknown	Unknown	Unknown	Unknown	Unknown	Unknown	Unknown	Unknown	Unknown	Unknown	Unknown
SIP							V-NO SCH	V-NO SCH	V-NO SCH	V-NO SCH	V-NO SCH	V-NO SCH
TOTAL PARTICULATE MATTER												V-NO SCH
NSPS			Unknown	Unknown	Unknown	Unknown	V-NO SCH	V-NO SCH	V-NO SCH	V-NO SCH	V-NO SCH	V-NO SCH
TOTAL PARTICULATE MATTER												V-NO SCH

High Priority Violator (HPV) History section: "Unaddr" means the facility has not yet been addressed with a formal enforcement action. "Addr" means the facility has been addressed with a formal enforcement action, but its violations have not been resolved. Lead Agency designated can be US EPA, State, Both, or No Lead Determined. If HPV History is blank, then the facility was not a High Priority Violator. C=Compliance; V=Violation; S=Compliance Schedule.

CWA/NPDES Compliance Status												
Statute:Source ID CWA:OH0011207	QTR1 Jan- Mar08	QTR2 Apr- Jun08	QTR3 Jul-Sep08	QTR4 Oct- Dec08	QTR5 Jan- Mar09	QTR6 Apr- Jun09	QTR7 Jul-Sep09	QTR8 Oct- Dec09	QTR9 Jan- Mar10	QTR10 Apr- Jun10	QTR11 Jul-Sep10	QTR12 Oct- Dec10
Non-compliance in Quarter		Yes	Yes	Yes	Yes	Yes	Yes	No	No	Yes	Yes	Yes
SNC/RNC Status »	E (EffViol)	E (EffViol)	R (Resolvd)			E (EffViol)	R (Resolvd)			N (RptViol)	R (Resolvd)	
Effluent Violations by NPDES Parameter:												
View effluent charts for all parameters: Only Charts with Violations All Charts Custom Output (or click on parameter names below for individual parameter charts)												
Discharge point:005												
pH. maximum	NMth	Lim Viol	Lim Viol			Lim Viol						Lim Viol
pH. minimum	Neither		Lim Viol									
Cadmium, total recoverable	Mthly										13%	
Oil and grease (soxhlet extr.) tot.	Mthly				94%		9%					
Silver total recoverable	Mthly						501%					
	NMth						23%					
	Mthly			6%	13%		62%					

Solids, total suspended	NMth					13%							
Zinc, total recoverable	Mthly	53%	127%			22%	44%						
	NMth	12%	123%										
Discharge point:601													
Coliform, fecal MF, MFC broth, 44.5 C	Mthly		40%										9%

Effluent Violations are displayed as highest percentage by which the permit limit was exceeded for the quarter. **Bold, large** print indicates Significant Non-compliance (SNC) effluent violations. **Shaded boxes** indicate unresolved SNC violations.

CWA/NPDES Compliance Status													
Statute:Source ID		QTR1	QTR2	QTR3	QTR4	QTR5	QTR6	QTR7	QTR8	QTR9	QTR10	QTR11	QTR12
CWA:OH0133094		Jan-Mar08	Apr-Jun08	Jul-Sep08	Oct-Dec08	Jan-Mar09	Apr-Jun09	Jul-Sep09	Oct-Dec09	Jan-Mar10	Apr-Jun10	Jul-Sep10	Oct-Dec10
Non-compliance in Quarter		Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No	No	No
Facility Status		S (CSchVio)	S (CSchVio)	S (CSchVio)	S (CSchVio)	S (CSchVio)	S (CSchVio)	S (CSchVio)	S (CSchVio)	S (CSchVio)			
Effluent Violations by NPDES Parameter:													
View effluent charts for all parameters: Only Charts with Violations All Charts Custom Output (or click on parameter names below for individual parameter charts)													
Discharge point:602													
Oil and grease (soxhlet extr.) tot.	NMth				11%								
Solids, total suspended	NMth				95%								
Discharge point:603													
Nitrogen, ammonia total (as N)	Mthly							7%					
Solids, total suspended	Mthly	108%											
	NMth	39%											

RCRA Compliance Status													
Statute:Source ID		QTR1	QTR2	QTR3	QTR4	QTR5	QTR6	QTR7	QTR8	QTR9	QTR10	QTR11	QTR12
RCRA:OHD061731857		Jul-Sep08	Oct-Dec08	Jan-Mar09	Apr-Jun09	Jul-Sep09	Oct-Dec09	Jan-Mar10	Apr-Jun10	Jul-Sep10	Oct-Dec10	Jan-Mar11	Apr-Jun11
Facility Level Status		In Viol	In Viol	In Viol	In Viol	In Viol	In Viol	In Viol	In Viol	In Viol	In Viol	In Viol	In Viol
Type of Violation	Agency												
TSD - Financial Requirements	EPA	03/31/94	>>>>	>>>>	>>>>	>>>>	>>>>	>>>>	>>>>	>>>>	>>>>	>>>>	>>>>
TSD IS-Ground-Water Monitoring	OH	11/15/94	>>>>	>>>>	>>>>	>>>>	>>>>	>>>>	>>>>	>>>>	>>>>	>>>>	>>>>
TSD IS-Ground-Water Monitoring	OH	11/15/94	>>>>	>>>>	>>>>	>>>>	>>>>	>>>>	>>>>	>>>>	>>>>	>>>>	>>>>
TSD IS-Ground-Water Monitoring	OH	11/15/94	>>>>	>>>>	>>>>	>>>>	>>>>	>>>>	>>>>	>>>>	>>>>	>>>>	>>>>
TSD IS-Ground-Water Monitoring	OH	11/15/94	>>>>	>>>>	>>>>	>>>>	>>>>	>>>>	>>>>	>>>>	>>>>	>>>>	>>>>
TSD IS-Ground-Water Monitoring	OH	11/15/94	>>>>	>>>>	>>>>	>>>>	>>>>	>>>>	>>>>	>>>>	>>>>	>>>>	>>>>
TSD IS-Ground-Water Monitoring	OH	11/15/94	>>>>	>>>>	>>>>	>>>>	>>>>	>>>>	>>>>	>>>>	>>>>	>>>>	>>>>
TSD IS-Ground-Water Monitoring	OH	11/15/94	>>>>	>>>>	>>>>	>>>>	>>>>	>>>>	>>>>	>>>>	>>>>	>>>>	>>>>

RCRA Compliance Status													
Statute:Source ID		QTR1	QTR2	QTR3	QTR4	QTR5	QTR6	QTR7	QTR8	QTR9	QTR10	QTR11	QTR12
RCRA:OHR000007773		Jul-Sep08	Oct-Dec08	Jan-Mar09	Apr-Jun09	Jul-Sep09	Oct-Dec09	Jan-Mar10	Apr-Jun10	Jul-Sep10	Oct-Dec10	Jan-Mar11	Apr-Jun11
Facility Level Status													
Type of Violation	Agency												

The first date displayed for a RCRA Violation corresponds to the violation determination date, and the next to the resolution date (if the violation has been resolved).

Notices of Violation or Informal Enforcement - AFS, PCS, ICIS-NPDES, RCRAInfo (05 year history)

[Data Dictionary](#)

Statute	Source ID	Type of Action	Lead Agency	Date
CAA	3915500004	NOV ISSUED	EPA	07/01/2009
CWA	OH-N00009520	Letter of Violation/ Warning Letter	State	04/26/2010

CWA	OH-N00008706	Letter of Violation/ Warning Letter	State	12/18/2007
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Formal Enforcement Actions - (05 year history)

AFS, PCS, RCRAInfo, NCDB

[Data Dictionary](#)

Statute	Source ID	Type of Action	Lead Agency	Date	Penalty	Penalty Description
- No data records returned.						

In some cases, formal enforcement actions may be entered both at the initiation and final stages of the action. These may appear more than once above. Entries in *italics* are not "formal" actions under the PCS definitions but are either the initiation of an action or penalties assessed as a result of a previous action. This section includes US EPA and State formal enforcement actions under CAA, CWA and RCRA.

ICIS

[Data Dictionary](#)

Primary Law/Section	Case Number	Case Type	Lead Agency	Case Name	Issued/Filed Date	Settlement Date	Federal Penalty	State/Local Penalty	SEP Cost	Comp Action Cost
- No data records returned.										

Federal enforcement actions and penalties shown in this section are from the Integrated Compliance Information System (ICIS-FE&C). These actions may duplicate records in the Formal Enforcement Actions section.

Environmental Conditions

[Data Dictionary](#)

Permit ID	Watershed	Watershed Name	Receiving Waters	Impaired Waters?	Combined Sewer System?
OH0011207	05030103	Mahoning, Ohio, Pa.	MAHONING RIVER	303(d) Listed	No
OH0133094	05030103	Mahoning, Ohio, Pa.	CULVERT LEAD TO MAHONING RV	303(d) Listed	No

TRI History of Reported Chemicals Released in Pounds per Year at Site:44482CPPRW4000M,44482HSTRF4MAHN

[Data Dictionary](#)

Chemical releases reported to TRI are provided for context and are not associated with non-compliance for that facility.

Year	Total Air Emissions	Surface Water Discharges	Underground Injections	Releases to Land	Total On-site Releases	Total Off-site Transfers	Total Releases and Transfers
2001						193,515	193,515
2002						123,450	123,450
2003						127,710	127,710
2004						205,750	205,750
2005						259,812	259,812
2006						282,472	282,472
2007	73,457	110			73,567	230,447	304,014
2008	1,699	27			1,726	450,107	451,833
2009	1,538	66			1,604	206,448	208,052

TRI Total Releases and Transfers by Chemical and Year

Chemical releases and transfers are in pounds except where otherwise noted.

Chemical Name	2001	2002	2003	2004	2005	2006	2007	2008	2009
LEAD COMPOUNDS						202	4,784	9,304	4,712
MANGANESE COMPOUNDS							30,745	28,001	14,549
MERCURY COMPOUNDS							574	501	101
ZINC COMPOUNDS							119,841	119,631	62,205
MANGANESE	90,455	49,000	50,005	78,150	96,701	112,110	117,700	137,067	56,247
NICKEL	15,555			13,100	15,706	27,510	28,450	28,322	10,286
CHROMIUM	87,505	74,450	77,705	114,500	147,405	142,650	1,920	129,007	59,952

Demographic Profile of Surrounding Area (3 Miles)

[Data Dictionary](#)

Open more detailed information in a new window (links leave ECHO): [1 Mi](#) [3 Mi](#) or [5 Mi](#).

This section provides demographic information regarding the community surrounding the facility. ECHO compliance data alone are not sufficient to determine whether violations at a particular facility had negative impacts on public health or the environment. Statistics are based upon the 2000 US Census data, and are accurate to the extent that the facility latitude and longitude listed below are correct. The latitude and longitude are obtained from the EPA [Locational Reference Table\(LRT\)](#) when available.

Radius of Area:	3 Miles	Land Area:	99.72%	Households in area:	13,299
Center Latitude:	41.277159	Water Area:	0.28%	Housing units in area:	14,419
Center Longitude:	-80.842105	Population Density:	1164.81/sq. mi.	Households On Public Assistance:	676

Total Persons:	32,836	Percent Minority:	17.35%	Persons Below Poverty Level:	4,642
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Race Breakdown	Persons (%)	Age Breakdown:	Persons (%)
White:	27,224 (82.91%)	Child 5 years and less:	2,876 (8.76%)
African-american:	4,803 (14.63%)	Minors 17 years and younger:	8,287 (25.24%)
Hispanic-Origin:	185 (0.56%)	Adults 18 years and older:	24,550 (74.77%)
Asian/Pacific Islander:	95 (0.29%)	Seniors 65 years and older:	5,307 (16.16%)
American Indian:	36 (0.11%)		
Other/Multiracial:	67 (0.20%)		

Education Level (Persons 25 & older)	Persons (%)	Income Breakdown:	Households (%)
Less than 9th grade:	916 (4.44%)	Less than \$15,000:	2,847 (21.41%)
9th-12th grades:	3,661 (17.76%)	\$15,000-\$25,000:	2,058 (15.47%)
High School Diploma:	10,422 (50.55%)	\$25,000-\$50,000:	4,592 (34.53%)
Some College/2-yr:	3,708 (17.98%)	\$50,000-\$75,000:	2,261 (17.00%)
B.S./B.A. or more:	1,911 (9.27%)	Greater than \$75,000:	1,513 (11.38%)

Notice About Duration of Violations -- The duration of violations shown on this report is an estimate of the actual duration of the violations that might be alleged or later determined in a legal proceeding. For example, the start date of the violation as shown in the ECHO database is normally when the government first became aware of the violation, not the first date that the violation occurred, and the facility may have corrected the violation before the end date shown. In some situations, violations may have been corrected by the facility, but EPA or the State has not verified the correction of these violations. In other situations, EPA does not remove the violation flag until an enforcement action has been resolved.



This report was generated by the Integrated Data for Enforcement Analysis (IDEA) system, which updates its information from program databases monthly. The data were last updated: AFS: 04/16/2011. RCRAInfo: 04/19/2011. NCDB: 10/27/2006. FRS: 04/14/2011. TRI: 01/27/2011. ICIS: 04/15/2011.

Some regulated facilities have expressed an interest in explaining data shown in the Detailed Facility Reports in ECHO. Please check company web sites for such explanations.

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Facility Description

The CSC Industries/Copperweld Steel plant (now Warren Steel Holdings, LLC) began operations in 1939. Copperweld filed for Chapter 11 bankruptcy protection on November 22, 1993. The company emerged from bankruptcy as CSC Ltd. In 1995, the company was acquired by Hamlin Holdings, Inc. New treatment facilities were constructed in late 1992. Operations were shut down on March 31, 2001 and much of the historical complex was disassembled.

CSC Limited manufactured steel bars of which 80 percent of the product was commercial grade alloy steel while 20 percent was carbon steel grade. Historical operations at the facility included:

- melting using electric arc furnaces;
- hot forming using a 35 inch blooming mill and a 12 inch mill;
- cold forming;
- acid pickling;
- continuous casting; and
- vacuum degassing.

Warren Steel Holdings began refurbishing the facility in 2006 - 2007. The facility is presently undergoing quality control testing and anticipates being in full production during 2008 with an operating capacity of up to 800,000 tons/year. The former hot forming, cold forming, and acid pickling operations will not be utilized.

The process operations are categorized under the Standard Industrial Classification (SIC) Code 3312, "Steel Works, Blast Furnace, Rolling and Finishing Mills." Process wastewater discharges from this facility are regulated under the Federal Effluent Guidelines, 40 CFR Part 420.

Development of Water-Quality-Based Effluent Limits

Determining appropriate effluent concentrations is a multiple step process in which parameters are identified as likely to be discharged by a facility, evaluated with respect to Ohio water quality criteria, and examined to determine the likelihood that the existing effluent could violate the calculated limits. In addition, antidegradation and whole effluent toxicity issues must be addressed.

As in past modeling studies, all facilities discharging to the Mahoning River mainstem between the Leavittsburg dam and the Ohio-Pennsylvania boundary are considered interactive and are included in the wasteload allocation (WLA). The WLA contains a total of 24 outfalls from 6 municipal WWTPs and 7 industrial facilities, as follows:

Warren Steel Holdings (CSC Industries)	Thomas Steel Strip
Warren Consolidated Industries	ISG (Mittal) Steel
Warren WWTP	Reactive Metals Inc.

Orion Power Midwest, Niles Plant
McDonald Steel
Youngstown WWTP
Struthers WWTP

Niles WWTP
Campbell WWTP
Lowellville WWTP

Four dischargers located on tributaries are allocated separately from the mainstem discharges: Meander Creek WWTP (Meander Creek), Girard WWTP (Little Squaw Creek), Mosquito Creek WWTP (Mosquito Creek), and Boardman WWTP (Mill Creek). Travel time to and distance from the Mahoning River are considered large enough that, for modeling purposes, the effluents from the respective treatment plants are considered non-interactive with the direct dischargers to the Mahoning. Effluents from these four treatment plants were allocated to meet water quality standards for the conditions, habitat, and use designation for their particular receiving waters and separate Permit Support Documents were prepared for each facility. Monitoring was conducted downstream of these dischargers or at the mouths of these tributaries, however, for inputs into the Mahoning River mainstem model.

Parameter Selection

Effluent data for Warren Steel Holdings were used to determine what parameters should undergo wasteload allocation. No new effluent data was available for this report. The sources of effluent data are as follows:

Self-monitoring data (LEAPS)	January 1996 through June 2001
Ohio EPA data (compliance, survey)	September 1999

The effluent data were checked for outliers and the following values were eliminated from the data set: cadmium, 102.4 $\mu\text{g/L}$; silver, 167 $\mu\text{g/L}$; and antimony, 75.9 $\mu\text{g/L}$. The average and maximum projected effluent quality (PEQ) values are presented in Table 3. For a summary of the screening results, refer to the parameter groupings at the end of this section.

Water Quality Standards

Ohio water quality standards (WQS) were used for all parameters except for chronic cadmium and chronic lead. The Mahoning River enters Pennsylvania at about river mile (RM) 11.43, and Pennsylvania WQS must be met at that point. The Pennsylvania Aquatic Life criteria and Human Health criteria were met at the state line for all other parameters (metals and organics).

Flows in the Mahoning River

Flows in the Mahoning River are contributed by a series of reservoirs in the headwaters and on Mosquito Creek, controlled and mostly owned by the U.S. Army Corps of Engineers. Constructed several decades ago to provide adequate flow for the steel industry of the Mahoning River valley, the reservoirs are operated on a schedule to maintain specific seasonal flows at Leavittsburg and Youngstown. The operation of the



Former Copperweld Steel mill to reopen

Friday, June 1, 2007

The mill is looking to add 40 to 50 workers.

By ED RUNYAN

VINDICATOR TRUMBULL STAFF

CHAMPION — It's not the Copperweld Steel of old, but the start of Warren Steel Holdings LLC on the former Copperweld site represents a significant investment and a hopeful sign for the once-bustling mill, one local official said.

Reid Dulberger, executive vice president of the Regional Chamber, said the amount of work that has taken place at the Mahoning Avenue facility in the past year has been remarkable. The land is in Warren Township.

A great deal of investment took place to get the melt shop and never-used continuous steel caster into operating shape, following closure of the mill in 2001 after Chapter 11 bankruptcy, Dulberger said.

Not only did a great deal of the machinery need to be refurbished, but much of the wiring inside the plant had to be replaced because it had been removed by thieves, who sold its copper, he said.

"I think we all believed that site would be vacant and the community would be left with another brownfield site to deal with," Dulberger said of 2001, when the Privat Group of the Ukraine bought the facilities and 400 acres. "At the time of the auction, it appeared there would never be steel made there again," he said.

Ron Bidula, the plant's manager, said the approximately 100 workers at the mill are in the final phases of testing the mill's capabilities. He expects to begin producing steel billets sometime soon, but wouldn't give an exact date.

Past attempt

The company attempted to reopen the mill last summer and hired employees. But that effort fell through when a partner of the Privat Group moved on, Dulberger said. Most of the workers were let go.

Workers were hired again this spring, and Bidula estimates an additional 40 to 50 workers are still needed.

Dulberger said Bidula, a 40-year veteran of the steel industry, has done a great job.

"They have a very good group in place to restart the operation," Dulberger said. "It was closed for

several years, and ... [reopening] is a very difficult thing to do."

He added that Bidula and his staff have worked well with the state of Ohio to bring the plant in line with water and pollution standards.

The steel will be sent to customers who will turn it into seamless tubing, such as that used in the oil and gas drilling industry.

Also operating at the former Copperweld site is Ohio Star Forge, on the Champion Township side of the property. Ohio Star Forge is a steel fabricating company employing 70 to 80 people on a 10-acre site.

Two other operations

Dulberger noted that the opening of Warren Steel Holdings gives the Mahoning Valley a third steel-making operation, joining Warren Consolidated Industries on Pine Avenue in Warren and V&M Star on Martin Luther King Boulevard in Youngstown.

Warren Steel Holdings is more like V&M Star, Dulberger said, because they are both specialty steel operations that make their products from scrap. WCI makes its products from raw materials.

Copperweld Steel, later known as CSC Ltd., employed 1,120 steelworkers just before it closed in 2001.

CSC was unable to survive a downturn in the steel market that came just as it completed a \$100 million upgrade. The key to the improvement was the installation of a continuous caster and melt shop.

Bidula has said those improvements are what made the plant attractive to investors. The Privat Group paid \$6 million for the CSC melt shop and continuous caster and \$1.2 million for the 400-acre site.

Andy Barkley, vice president of member services at the Greater Warren Credit Union next door to the mill, said the reopening of the mill is additional good news for the area around the credit union, which was formerly known as Copperweld Steel Federal Credit Union. It started as a financial institution for Copperweld employees.

The addition of jobs at Ohio Star Forge and Leedsworld, a short distance away on North River Road, have helped boost employment.

"From a community standpoint and a business standpoint, it's positive news," said Barkley, also a Warren councilman.

Barkley said the credit union has seen some new customers from Warren Steel Holdings and hopes to establish a relationship with the new company similar to the one it had with Copperweld Steel.

Gary Steinbeck, subdistrict director of the United Steelworkers union for northeast Ohio, said there is no union contract in place at the facility and he had not discussed the issue with Bidula.



CC Metals and Alloys Acquired By Optima Group

March, 16 2011

Ferrosilicon supplier to join conglomerate of metals-based companies

URL for this article is: <http://www.foundrymag.com/Classes/Article/articledraw.aspx?HBC=news&CID=87101>

CC Metals and Alloys LLC, a major producer and supplier of specialty ferroalloys to the global iron foundry industry, has been acquired by **Optima Group LLC**. Based in Amherst, NY, CC Metals and Alloys production facilities are located in Calvert City, KY.

Founded in the 1940s as Pittsburgh Metallurgical, CC Metals and Alloys began as a large-volume commodity ferroalloy producer for the steel industry. In the 1980s, the company converted its product line to higher value added specialty ferrosilicons and magnesium ferrosilicon products when imports began to undercut domestic prices.

Now as CC Metals and Alloys, the company ships over 100,000 metric tons of finished product per year from its ISO 9001-certified facility to manufacturers of home furnishings, automotive parts, bridges, machinery, buildings, concrete, welding rods, tractor and lawn equipment. The product line features 40 different products, including 18 ferrosilicons and 20 magnesium silicons, as well as silica fume, inoculants, welding products, and powdered alloys.

According to the announcement, certain owners of **Optima Group** are also partial owners of several other metals-based companies, including **Felman Production, Inc.** (producer of ferrosiliconmanganese), **Michigan Seamless Tube LLC** (seamless tube and pipe company), **Warren Steel Holdings LLC** (continuously cast rounds of carbon and alloy steel), **Steel Rolling Holdings Inc.** (cold rolling), and **Felman Trading Inc.**, a ferroalloys trading company that will now be the primary distributor of the ferrosilicon produced by CC Metals and Alloys. Felman Trading has provided ferroalloy supplies to foundries in North, Central, and South America.

"CC Metals and Alloys' longstanding track record of quality, customer service, and on-time delivery, as well as concentration on specialty value-added products, will continue to be a hallmark under our ownership and fits well with Optima's overall strategy," said Optima CEO Motti Korf, who takes over similar duties of the newly-acquired company.

Korf also announced that current management of the Calvert City facility will remain intact to "ensure a smooth transition and continued success in meeting the high standards expected by its customer base." He added that previous CC Metals and Alloys CEO Ed Bredniak will remain with the company now as the chief operating officer.

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Old CSC mill is restored as Warren Steel

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Published: Sun, January 27, 2008 @ 12:00 a.m.

A former CSC worker returned to the mill because steel is in his blood.

By DON SHILLING

VINDICATOR BUSINESS EDITOR

American ingenuity and Ukrainian cash has an abandoned mill producing steel again.

Warren Steel Holdings shipped its first order of steel last month from the Champion Township mill that used to be known as Copperweld Steel and CSC Ltd.

The ingenuity came from people such as Bob Fitch, who was part of the crew that rebuilt the mill's equipment.

Fitch, a millwright, worked 20 years at the Mahoning Avenue mill under previous owners and never figured he'd be back inside after it closed in 2001. He went to work for a contractor and a welding company but jumped at the chance to return to the mill a year ago.

"Once steel gets in your blood, it stays there," said the 61-year-old Bristolville resident.

A massive effort restored the mill to working order after damage from neglect and water, as well as vandals and thieves. All of the electronics had been stripped, and copper and other metals had been stolen.

Dan Sechler, Warren Steel's maintenance supervisor, said he tried to find as many former CSC trades workers as he could to repair the facility. He ended up with only a handful because many had moved away or didn't want to return.

Over the past two years, he's had 50 employees and 20 contractors at the mill, installing electronics and repairing the large equipment that melts scrap steel and casts semifinished steel bars and billets.

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Now that the mill is producing, it employs 90. The mill employed 1,300 when it closed.

The cash for restarting the mill came from Privat Group, a privately held Ukrainian company controlled by four investors.

Ron Bidula, plant manager, wouldn't disclose how much money was spent on the mill but said Privat hasn't cut corners. Much of the equipment runs better now than when it was installed because of advanced electronics that recently were added, he said.

"Everything that's been done here is in Cadillac fashion. We're not driving a used car here," he said.

That's not apparent when you first drive into the complex. Massive parking lots are empty with occasional weeds sprouting. Some buildings have large holes in their sides.

Warren Steel isn't concerned about much of the 400-acre site because it is only using the heart of the mill — a 20-acre section that houses the melt shop and continuous caster.

CSC's rolling and finishing equipment were sold at auction, so much of the property is vacant.

The melt shop is where scrap steel is recycled using an electric arc furnace. Integrated steelmakers, such as WCI Steel in Warren, use a blast furnace to produce molten iron from iron ore, limestone and coke.

CSC had just installed its caster and melt shop when it ran out of money and filed for bankruptcy. These pieces were the major parts of a \$100 million capital improvement project that was designed to turn the company into an efficient producer of steel bars.

Privat paid \$6 million for the caster and melt shop and later paid \$1.2 million for the land.

At first, Privat intended to ship the caster and melt shop back to the Ukraine, where it produces steel and has mining operations. The company also controls banking, chemical, energy and food companies.

Privat's plans changed when the U.S. steel market improved and it saw that it could make money here, Bidula said. Privat also bought a West Virginia plant that makes an alloy used in steelmaking and a rolling mill in Michigan that is closed.

CSC's operation was called a minimill, a plant that takes scrap steel and turns it into a semifinished or finished product. Warren Steel is a micro-mill, which means it casts steel that needs further hot rolling and treating to create a product.

Bidula said Warren Steel officials had thought their first orders would be for seamless tube used by the oil and gas industry.

Instead, forging companies have been most interested in its steel, he said. These companies reheat the mill's steel and then shape it into a variety of products for aerospace, automotive and other industries.

Wayne Smith, Warren Steel's vice president of sales, said the addition of rolling operations is being studied. That work could be done on site or at another location, but it would allow the mill to serve customers that need additional processing work, he said.

Bidula said the mill has the capacity to produce 800,000 tons of steel a year, although it is producing just a fraction of that now. The electric arc furnace and caster came online this past summer, but crews worked throughout the rest of the year to make sure everything was running properly, he said.



Bidula said the mill will have 125 employees once it is running at capacity.

Because of its energy usage, the mill operates at night when systemwide electric demand is lower. As production builds, the mill will add weekend operations and run from 9 p.m. Friday to 8 a.m. Monday, Bidula said.

Both Bidula and Smith were recruited to come to Warren Steel. Smith, 43, worked in sales for a Chicago die manufacturer,

Bidula, 63, used to work for West Virginia steel and alloy producers. He has a bachelor's degree in metallurgy and material science from Carnegie Mellon University and a master's degree in the same fields from Ohio State University.

Both men said they wanted the challenge of running a startup organization. Bidula, who has overseen all of the repairs and production over the past two years, said the effort has been worth it.

"It's been very rewarding," he said.

shilling@vindy.com

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METALS AND MINING

June 07, 2011 4:22 PM ET

Warren Steel Holdings, LLC

[Snapshot](#) [People](#)

COMPANY OVERVIEW

Warren Steel Holdings, LLC, a melt shop and casting mill, produces and markets carbon and alloy steel cast rounds in the United States and internationally. The company was incorporated in 2001 and is based in Warren, Ohio.

KEY EXECUTIVES

Mr. Wayne Smith
Vice President of Sales

Compensation as of Fiscal Year 2010.

4000 Mahoning Avenue
Warren, OH 44483
United States
Founded in 2001

Phone: 330-847-0487
Fax: 330-847-9130
www.warrensteelholdings.com

SIMILAR PRIVATE COMPANIES BY INDUSTRY

Company Name	Region
Cardinal Steel Supply, Inc.	United States
Cargill Robinson LLC	United States
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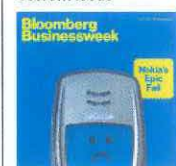
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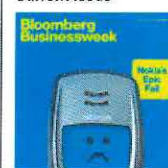
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MAGAZINE

Current Issue



Ohio Star has acquired
a right-of-way through Warren
Steel Holdings property

Ohio Star Forge Grows Through Diversification

Posted: October 2, 2009

This Warren, Ohio, forge is primarily a high-volume producer of bearings and other products for automotive applications. It has found growth opportunities by diversifying its product mix and the industries it serves.



Shown as a manufactured blank (left), intermediate part (center) or as a finished part (right), synchronizer sleeves are typical of OSF products.

There is no sign on the road to tell you it's there, and unless you knew where to look you could easily miss Ohio Star Forge's plant near Warren, Ohio. Located adjacent to, and partially obscured by, the Warren Steel Holdings plant is a 10-acre tract of land that contains a few buildings housing 147,000 square feet of production space under high-ceilinged production bays serviced by overhead cranes and filled with the production sounds of high-volume forging operations.

Ohio Star Forge (OSF), an ISO 9001:2000-certified company, is one part of a five-plant International Forging Division of Daido Steel, Japan, and the only one located in the U.S. The other four forging facilities are in Japan. In the 1980s, accompanying a wave of burgeoning Japanese automotive production in the

U.S., Daido Steel was encouraged by automotive producers to provide some steelmaking capabilities to the growing effort. Rather than start a greenfield facility, Daido partnered with Copperweld Steel Corporation to buy an existing mill in the Warren area.

In 1988, adjacent to this location, OSF opened its doors with the intent of supplying Japanese bearing manufacturers with the forged products they needed to supply the automotive companies. The first forgings shipped in 1989. In 1994, Daido Steel sold its steel-mill interests to Copperweld Steel Corporation, which eventually became Warren Steel Holdings. That same year, OSF became a wholly owned subsidiary of Daido Steel.

Company Evolution

At its inception, OSF was primarily a bearing component manufacturer that served the domestic operations of Japanese auto manufacturers that were manufacturing or assembling vehicles in the U.S. The company did this successfully through the 1990s and built itself serving this market. Supervising this growth was OSF's management team led by current president and CEO, Jeffrey P. Downing, who joined the company in that capacity in 1995.

"In the early 2000s, a lot of commodity bearing manufacturing migrated to China, so we decided to diversify our customer base by diversifying our product line as determined by customer needs," Downing said. "We invested in equipment that added to our capabilities to diversify our product mix. And we worked long and hard to be an approved supplier to companies like, for example, Caterpillar."

Despite its successfully diversified customer and product base, OSF still makes a lot of bearing components and boasts that millions of people in passenger cars, light trucks and SUVs ride safely on its products. The company produces a wide range of parts for Tier 1 and Tier 2 suppliers to the automotive industry.

Product Capabilities and Equipment

In 2008, OSF shipped more than 50 million pieces of metal parts from its high-volume manufacturing operations. The breakdown of these shipments is as follows: 33% cold form blanks for bearing and fitting applications (always a significant part of their volume), 24% automotive wheel bearing components, 17% tapered roller components, 8% automotive transmission parts, 7% forged balls for bearings, 7% fasteners (nuts) and 6% general industrial components. About 70% of these products end up in automotive products, 10% are destined for the heavy-truck market, 5% each are used for the off-road vehicle and energy markets, and the remaining 10% goes to miscellaneous industries.



Four-stage tooling fixture for Hatebur horizontal forging system

The company's major customers include Timken, NSK, NTN and Caterpillar. Since 2005, the company's sales have averaged more than \$34 million annually on shipments ranging from 4-5 million parts per month.

These high-volume targets are met by four Hatebur machines (two three-stage AMP30 units, one four-stage AMP40 unit and one four-stage AMP50XL unit) and nine Kyoei Seiko cold-rolling machines. OSF uses the Hatebur process because it believes the process produces high-quality steel parts that meet or exceed the specifications set forth by its customers.

To produce its typical hot-forged parts, raw-steel feed materials are received in round bars up to 30 feet in length, often from customer-specified steel suppliers located in Japan, Europe or the U.S. No sawing is done on the premises, so off-loaded bars are placed into interior or exterior storage racks until needed.



Bars ready for production are heated in a multi-station line of induction heaters. The larger the diameter of the bar, the more stations of induction heating required. Bars fed through the induction heaters come out at 1150-1250°C. The heated bars

Steel bar is heated by multi-stage induction before it is mechanically sheared and fed to the Hatebur machines for three- or four-stage forming.

are mechanically sheared, at which point mechanical fingers place the hot bar into the three- or four-stage Hatebur machines when the tooling horizontally forges the pieces into shape.

Forged parts are then put on a conveyor that dumps them into a furnace tray for insertion into the spheroidizing furnace. After 18-20 hours of thermal treatment, parts are softened for further machining (at the customer's plant) or cold forming.

After annealing, the parts are shot blasted and passed through noncontact automated inspection lines that verify dimensional and weight specifications. After a final visual audit, the parts are packed for shipment to the customer.

The primary material used in OSF's mix of products is 52100-grade steel. This is a high-carbon, chromium-containing steel used principally in rotational bearings. The company's management is proud of its ability to successfully handle and work with this tough, abrasive material that is difficult to process and abusive to tooling. OSF both cold rolls and hot forges this material, a claim that few companies in North America can make.

OSF's commitment to quality is evident through its ISO 9001:2000 certification as well as numerous supplier quality awards. The company uses data-collection devices to give its operators real-time process control and utilizes PLC controls and monitoring devices to maintain accurate equipment operation. Additionally, OSF utilizes parent Daido Steel's complete metallurgical laboratory facility in Chita, Japan, to perform complete failure analysis.

Corporate Culture

It is frequently the case that U.S. operations of Japanese-owned companies are run and managed by native Japanese executives. At OSF, the chief financial officer, engineering manager and forging trainer are all Japanese nationals. However, the CEO, all other managers and the labor force are all local talent.

"One thing that is unique about us is the way American and Japanese staff members interact. We have a very cooperative relationship with our Japanese colleagues, and those who come over from Japan to work at OSF consider it an honor," said Carl J. Paglia, OSF's sales manager. "As a result, OSF has become a powerful synthesis of the best traits of American and Japanese manufacturing styles."

According to OSF general manager William J. Orbach, "We run a very lean organization here with some duties shared across the entire management team.



A tray of forged parts is ready to enter the spheroidizing annealing furnace.

This wouldn't be possible without excellent relations with our Japanese co-workers."

The company's labor force presently consists of 51 employees organized by the United Steelworkers.

Looking Forward

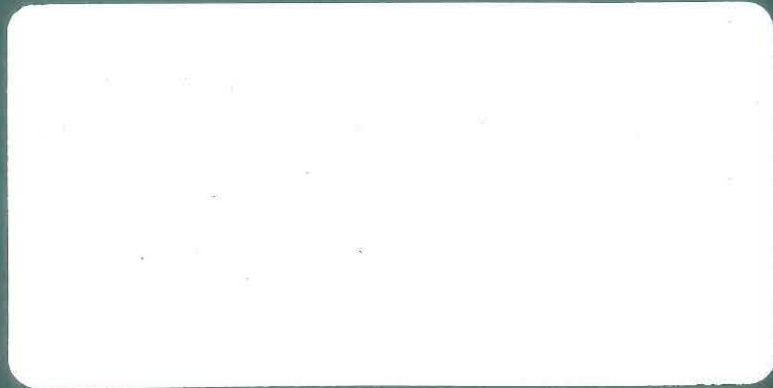


*Control panel for a
Hatebur forging
system*

Compared to 2008, this has been a slower year for OSF. Like many manufacturers and many others in the forging industry, OSF has been forced to adapt to domestic economic realities to survive and eventually regain its path toward growth. Although OSF started the year with 82 employees, poor business conditions and a weak automotive market have forced the company into two rounds of layoffs that moved a significant portion of its workforce out of jobs. Managers were clear that they intend to call back these workers as soon as business conditions improve.

Apropos to that, OSF's executives are very upbeat about the prospects for their company and about what they do. Everyone knows business conditions could be better, but doom and gloom do not permeate the executive offices. A walk out to the shop floor, where the sights and sounds of production were vibrant and where the Hateburs continued their high-volume production heedless of the state of the economy, reinforced the optimism that prevailed in the front office.

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MINI-MILL COMPLIANCE INITIATIVE MULTIMEDIA INSPECTION SUMMARY REPORT

CSC LTD.

WARREN, OHIO

Prepared for

**U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Solid Waste
Washington, DC 20460**

EPA Region	: 5
Contract No.	: 68-W4-0007
Work Assignment No.	: R05059
Date Prepared	: March 24, 1998
EPA Work Assignment Manager	: Pat Kuefler
Telephone No.	: (312) 353-6268
Prepared by	: Tetra Tech EM Inc.
Tetra Tech Project Manager	: Robert Foster
Telephone No.	: (312) 856-8724



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- 2 CAA-NESHAP INSPECTION REPORT
- 3 CWA-NPDES INSPECTION REPORT
- 4 CWA-SPCC INSPECTION REPORT
- 5 RCRA AND OAC - HAZARDOUS WASTE INSPECTION REPORT
- 6 EMS INSPECTION REPORT

**MINIMILL COMPLIANCE INITIATIVE
MULTIMEDIA INSPECTION SUMMARY REPORT
CSC LTD., WARREN, OHIO**

Tetra Tech EM Inc. (Tetra Tech) received Work Assignment (WA) No. R05059 from the U.S. Environmental Protection Agency (EPA) under Contract No. 68-W4-0007 (REPA) to provide EPA Region 5 with support related to the minimill compliance initiative. This support includes reviewing and evaluating facility-specific multimedia environmental compliance information and providing technical support during field investigations.

As part of the Region 5 minimill initiative, a multimedia compliance inspection was conducted at the CSC Ltd. (CSC) facility in Warren, Ohio, on June 24 and 25, 1997. This report summarizes compliance issues contained in the individual inspection reports prepared for each environmental medium after the inspection. The facility background, inspection objectives, inspection team, inspection methods, and a summary of findings are discussed below.

FACILITY BACKGROUND

The CSC facility occupies approximately 400 acres in Warren, Ohio, about 65 miles southeast of Cleveland. CSC was previously called Copperweld Steel Company and then CSC Industries. The company is now called CSC Ltd. and is owned by the Reserve Group of Akron, Ohio. The facility produces high-quality alloy steel bars for service centers. Some blooms are purchased from other steelmakers for processing. Scrap steel for CSC operations is purchased from Phillips, which is located next to the CSC property. Slag from CSC steelmaking operations is processed by Heckett on CSC property leased to Heckett. The facility is a fully integrated, electric arc furnace (EAF) steel mill with ladle refining, vacuum degassing, and bottom pouring equipment; two rolling mills; complete thermal treatment facilities; and turn-and-grind operations. The facility consists of four alternating current EAFs, each producing 83 to 84 tons of steel per heat; one scarfer; three pickling tanks; and two boilers. The facility operates 7 days per week, three shifts per day, and employs 1,200 people.

INSPECTION OBJECTIVES

The specific objective of the inspection was to determine CSC facility compliance with the following:

- Clean Air Act (CAA) regulations, including State Implementation Plan (SIP) and National Emission Standards for Hazardous Air Pollutants (NESHAP)
- Clean Water Act (CWA) regulations, including National Pollutant Discharge Elimination System (NPDES) Permit No. OH0011207 requirements and Spill Prevention Control and Countermeasures (SPCC) regulations
- Hazardous waste management regulations under the Resource Conservation and Recovery Act (RCRA) and the Ohio Administrative Code (OAC)

In addition to these regulations, the facility's environmental management system (EMS) was inspected to determine its overall adequacy.

INSPECTION TEAM

The following EPA, Tetra Tech, and CSC personnel were present at the inspection.

<u>Name</u>	<u>Affiliation</u>	<u>Responsibility</u>
Mark Moloney	EPA	Team leader, all media
Jeffrey Bratko	EPA	CAA and EMS
Ed Wojciechowski	EPA	CAA and steelmaking process
Paul Kovak	EPA	All media
Larry Lins	EPA	All media
Sirtaj Ahmed	EPA	RCRA compliance inspection
George Opek	EPA	CWA-SPCC compliance inspection
Robert Foster	Tetra Tech	CWA-NPDES
Jack VanKirk	CSC	Manager, Environmental Affairs
Joseph Ford	CSC	Manager, Safety and Security
Allen Dittenhoefer	Enviroplan Consulting	All media
Walter Fridley	Enviroplan Consulting	All media

INSPECTION METHODS

The investigation of the CSC facility included the following:

- A review of federal and state regulatory files
- On-site inspection of the facility, including
 - Discussions with facility personnel
 - Inspection of facility operations
 - Review of facility records and documents
 - Wastewater sampling and emissions readings

SUMMARY OF FINDINGS

Significant findings during this inspection are summarized below. Additional information is available in the six individual inspection reports, which are included as attachments to this report.

CAA - SIP

The inspection found several issues related to the facility's compliance with SIP and operating permit requirements, some of which will need follow-up:

- Periodically, light to moderate emissions exited from the ladle refining furnace (LRF) into the EAF shop.
- CSC personnel acknowledged that an emissions problem with EAF No. 5 had occurred during its startup on June 23 (the day before the inspection). Visible emissions were observed by an EPA inspector from off-site during a site reconnaissance on that day, thus indicating an SIP limit exceedance. CSC should have notified the Ohio Environmental Protection Agency (OEPA) of the emissions problem. This issue requires follow-up.

- CSC did not have a routine inspection and maintenance schedule for its EAF baghouse.
- CSC could not verify compliance of the scarfer electrostatic precipitator (ESP) with SIP limits. Stack testing may be needed.
- A mass balance is needed to determine emissions from the open-top sulfuric acid pickling tanks. Additional process information may be needed to perform the mass balance.
- CSC indicated that boiler house baghouse is bypassed when emissions problems are experienced. Further, CSC does not have routine inspection and maintenance procedures for boiler emissions control systems. Visible emissions were in compliance during the inspection; however, stack test results were not available to determine compliance with sulfur dioxide limits.

CAA - NESHAP

This portion of the inspection covered compliance with asbestos-related NESHAP regulations. No asbestos abatement activity was observed during the inspection. The asbestos NESHAP inspection at the CSC facility consisted solely of a records review. The waste manifests and asbestos notifications reviewed did not contain all of the information required by Title 40 of the Code of Federal Regulations (40 CFR), Parts 61.145(b) and 61.149(e). For example, CSC's Asbestos Notification of Demolition and Renovation does not (1) report the scheduled start and completion dates of asbestos-related demolition or renovation, (2) describe the planned renovation work to be performed, or (3) describe work practices and engineering controls to be used to comply with the asbestos NESHAP regulations as required by 40 CFR, Part 61.145(b).

CWA - NPDES

The CWA inspection included a review of monitoring records, field inspection, and collection of wastewater samples at permitted discharges. The following issues were noted during the inspection:

- OEPA issued a notice of violation (NOV) to CSC in December 1996 as a result of an unauthorized discharge at the weir located at former outfall 002. During this inspection it was found that CSC addressed the NOV by installing a high-level alarm system at the location of former outfall 002.
- Discharge monitoring reports indicate that CSC is in compliance with its NPDES permit requirements. Wastewater samples collected by Tetra Tech also met permit concentration limitations. However, monthly average concentrations are not calculated on a flow-proportioned basis as required by the permit's general conditions. The inspection report recommends that CSC revise its method for calculating monthly average concentrations to comply with permit requirements. It is also recommended (but not required) that CSC request duplicate sample analysis about once per year as a quality control check of analytical results.
- The temperature of CSC's effluent composite sample was 9.7 °C, which exceeds the recommended 4 °C. The inspection report recommends that effluent composite samples be maintained at a temperature of less than 4 °C.
- During the inspection, the facility appeared to be well maintained; however, no maintenance records were available. The inspection report recommends that CSC maintain wastewater treatment plant (WWTP) maintenance records that are available for inspection. A written WWTP maintenance schedule should also be available.

CWA - SPCC

The inspection found that the facility's SPCC plan does not address the requirements of 40 CFR, Part 112. The deficiencies noted were (1) failure to amend the SPCC plan, (2) failure to review the SPCC plan at least every 3 years, and (3) an inadequate SPCC plan. The inspection report recommends that CSC promptly take action to correct these violations and to comply with SPCC regulations.

RCRA and OAC - Hazardous Waste

The inspection report lists wastes being generated and managed at the site and a brief description of waste handling procedures. Wastes handled at the site include EAF baghouse dust (K061), Safety-Kleen Corporation parts washer fluids (D001, D018, and D039), and waste sulfuric acid (K062). CSC recycles 15 percent of its mill scale; the remainder is sent for off-site recovery of lead, zinc, and cadmium. Two on-site landfills have been closed in accordance with approved closure plans, and the property is no longer owned by CSC. The inspection found the facility to be in compliance with all RCRA and OAC regulations.

At EPA's direction, Tetra Tech collected samples of EAF floor dust and sediments from Ponds A and C. Samples were analyzed by EPA's Central Regional Laboratory (CRL) in Chicago, Illinois, for metals toxicity by the toxicity characteristic leaching procedure (TCLP) and volatile organic compound (VOC) concentrations. All samples were found to be nonhazardous. VOCs were detected in Pond C sediment (sample No. 97KR03S03) -- carbon disulfide at 52 micrograms per kilogram (ug/kg) and 2-butanone at 110 ug/kg. Laboratory results are included at the end of Attachment 5.

Environmental Management System

In the early 1990s, environmental matters at the Copperweld Steel Company (the previous operator of the facility) were handled by the manager of engineering and maintenance. In 1992, the company established a position to cover environmental and health and safety matters. In 1995, when CSC took over the former Copperweld Steel Company, separate positions were established for safety matters and environmental matters. The manager of environmental affairs reports to the chief financial officer of CSC.

The facility does not currently have an extensive written company environmental policy. Employees hired by CSC are given a business card-sized document that contains a statement of philosophy of the Reserve Group, of which CSC is one of the companies. The company is currently developing an environmental policy in conjunction with an environmental resource manual (ERM), which was in draft form at the time of the inspection. The draft ERM appears to be a form of an EMS. The ERM is being developed by the companies that comprise the Reserve Group and includes a list of safety and environmental contacts at each of the companies. When the company's environmental policy is finalized, it will be given to all employees.

The systems in place at the CSC facility at the time of the inspection do not constitute an effective EMS. Major improvements are needed in the areas of recordkeeping, documentation, setting of goals and targets, and implementation. The EMS under development at CSC may address some of these problems.

ATTACHMENT 1

**PROCESS DESCRIPTION AND
CAA-SIP INSPECTION REPORT**

(6 Sheets)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5
AIR AND RADIATION DIVISION
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

DRAFT

DATE: August 22, 1997

SUBJECT: Inspection Report - CSC Ltd., Warren, Ohio

FROM: E. Wojciechowski, Environmental Engineer
Air Enforcement and Compliance Assurance Branch

TO: File

As part of the Region 5 Minimill Initiative, I participated in a multimedia inspection at CSC Ltd. on June 24 and 25, 1997. The inspection team consisted of seven people, with Jeff Bratko and myself providing the primary support on air matters. The remainder of the inspection team was Mark Moloney, Paul Kovak and Larry Lins (EDO, all media), George Opec (SPCC), Robert Foster (contractor, CWA) and Sirtaj Ahmed (RCRA).

General Information

In the preinspection meeting, Jack VanKirk, the company's environmental representative, told us the following:

The company was previously called Copperweld Steel and then CSC Industries. The company was spun off in 1989.

The majority of the company was Japanese owned until July 1993, when virtually all non-American money was pulled out of the company.

The company filed for bankruptcy (dated unknown), and its plan for reorganization was approved on October 12, 1995.

The company is now called CSC Ltd. (CSC) and is owned by Reserve Group in Akron.

Jack is the head of a one person environmental office, and day-to day environmental work is done by contractors and consultants.

The facility operates 7 days per week, 3 shifts per day, and employs approximately 1,200 people.

The facility produces high quality specialty steel bars to service centers.

Some blooms are purchased from other steelmakers for processing.

Scrap steel for CSC's operations is purchased from Phillips, which is located adjacent to CSC property.

Slag from CSC steelmaking operations is processed by Heckett, which is done on CSC property that is leased to Heckett.

The facility is located in Trumbull County, with the major air emission sources located in Warren Township, except for portions of some of the roads.

Electric Arc Furnace (EAF) Shop

There are four alternating current EAFs, designated as #5, #6, #8 and #9, each producing 83-84 tons of steel per heat.

The shop had a #7 furnace, but it was converted into an arc reheat furnace in 1989, and is used as a ladle refining furnace (LRF).

Furnace #5 is generally used only when there is a problem with one of the other furnaces.

The furnaces make both carbon and alloy steels.

Scrap preheating is not done.

Auxiliary burners are not used in the EAFs.

None of the furnaces are equipped with bottom tapping capability.

No one at the facility that we talked to had any knowledge any of the EAF transformers being changed.

Oxygen lancing has always been done at the facility.
The foamy slag process is not in use. The process was implemented some time ago, but trials were unsuccessful.
There are 3 to 4 scrap charges per heat.
The average heat time is 3 hours and 10 minutes.
Neither iron carbide nor iron pellets are charged into the EAFs as a substitute for steel scrap.
There are no furnace pressure or air flow monitors in use.
A heel is not used in the EAFs.
There is no AOD in the shop.
Leaded steel is made at the shop, with lead shot added during bottom pour teeming.
Each of the four furnaces has a fourth hole with a short piece of duct extending vertically, which serves to direct emissions upward to a canopy hood.
The roof monitor directly above each furnace is closed, and a scavenger duct is located above each furnace except above EAF #5.
The roof monitor above EAF #8 and #9 on the tap side is closed, but it is open above the other furnaces.
All of the canopy hoods and the scavenger duct are ducted to a 16 compartment baghouse.
The EAF baghouse exhausts approximately 1.1 million cfm through a roof monitor.
The baghouse is equipped with pressure drop gages, which are located near the top of the baghouse.
There is no continuous caster, but one has been purchased from Algoma Steel and is at the site in crates.
CSC plans to build a new shop and replace the existing four furnaces with a single furnace, and then install the continuous caster.

Scarfig Operations

There is one scarfer at this facility, which is located at the blooming mill. Emissions from the scarfer are drawn into a downdraft hood, and are ducted to a wet ESP.

Pickling Operations

Pickling operations occur in a building that is open to the outside, and there are no air pollution controls.
Pickling is done in three tanks containing a sulfuric acid solution.

Boiler House

There are two boilers in the boiler house, designated as #1 and #2.
Both boilers are coal fired Riley stokers.
Each boiler has its own stack, with both stacks breeched to a single eight compartment baghouse.
If there are problems with the baghouse, emissions are ducted back to the stacks.
The baghouse is equipped with pressure drop gages, which are in a room close to the operator.
The operator indicated that there are two complete baghouse inspections per year by a contractor, Technical Air Control.

Fugitive Dust

Many of the facility's roads were unpaved, and these appeared to be untreated. Roads that were paved did not appear to have been vacuumed or watered recently.

Records Review

CSC made available to us a number of records that we had requested in advance of the inspection.
On June 25, I reviewed company records which included boiler stack test information, fugitive dust control measures that were implemented and permit information.

FINDINGS

EAF Shop

On June 24, furnaces #6, #8 and #9 and the LRF were in use. I performed inside observations and recorded the times various operations occurred at each furnace, the magnitude of emissions (e.g., light, moderate, heavy) and the color of emissions. My inside observation sheets are attached. Observations of visible emissions from the roof monitor were simultaneously performed by a U.S. EPA observer. Since the furnaces did not have a direct shell evacuation system, all emissions generated were vented directly to shop. At times, all three operating furnaces had very heavy emissions.

Periodically, light to moderate emissions exited from the LRF into the shop. During the observation period, I did not observe any operation of the teeming area where leaded steel is made.

During the observation period, Alan Dittenhoefer, a CSC consultant from Enviroplan accompanied me.

During an initial walkthrough, company personnel advised me that the day before (June 23) furnace #6 had a problem, necessitating its shutdown and startup of furnace #5. I could not determine exactly the startup and shutdown times of the two furnaces. Jack VanKirk acknowledged that there have been emission problems with furnace #5, since there is no scavenger hooding in the roof above the furnace.

Visible emission observations of the roof monitor were performed from off-property on June 23. These observations indicate that the applicable SIP limit was exceeded. On-site observations on June 24 indicate compliance.

Visible emission observations were taken of the baghouse monitor on June 24, and the data indicates compliance.

CSC did not have a routine inspection and maintenance schedule of the EAF baghouse.

Jack Vankirk advised me that when there are emission problems at the EAF, he calls them in to OEPA. I do not know if he called in the excess emissions that were observed on June 23. This must be investigated, along with any malfunction language that may have been approved as part of the SIP.

Scarfer

I observed the scarfing operation on June 25, and at no time did I see any visible emissions from the stack of the ESP that it is ducted to.

The ESP is inspected and cleaned on a routine basis by a consultant.

Records of ESP inspections and repairs are kept, and a schedule is posted to ensure that necessary repairs are made.

The company could not recall when the last stack test of the ESP was conducted.

To determine if this source is in compliance with the mass emission SIP limit, a stack test needs to be performed, or to locate any recent tests that may have been done.

Pickling Operations

We observed pickling being done, but there were no visible vapors from the open-top sulfuric acid tanks. In order to determine the compliance status of this process, a mass balance should be done to determine how much acid is lost to the atmosphere. In order to do this, a request for process information is first needed.

Boiler House

I inspected the boiler house on June 25, and noted that while there is a pressure drop gage for each baghouse compartment, there is no routine for looking at the gages and recording data. I asked the operator how anyone would know if there is a problem, and he responded that smoke backs up into the building.

The operator advised me that when emission problems are experienced, the baghouse is bypassed.

A boiler house supervisor told me that the control system is inspected once

per week, but nothing is written down. He added that a checklist is being drawn up to be more proactive in correcting problems.

I asked Jack about stack test information that indicates that SO2 results have been reported as an average of the two boiler house stacks, rather than combined. He stated that he didn't know why it was done that way. I told him that on an average basis, the results show compliance, but violation if they are added.

This source may be in violation of the applicable SO2 limit, but copies of the stack test reports should be gathered.

Visible emission observations were taken of both the east and west boiler house baghouse stacks, and the data indicates compliance.

Fugitive Dust

Visible emission observations were taken of one section of unpaved road. Based on a permit in CSC's file, observations were taken of only that dust that crossed CSC's property line. This data, which was recorded on June 25, indicates compliance. However, the federally enforceable SIP does not distinguish between emissions that cross the property line and those that do not. Because of the overall untreated conditions of the roads, and lack of attention which is indicated by a records check, additional observations should be made. Care should be taken to ensure that any observations made should be in a township that is covered by the rule.

Records Review

EAF Shop - I documented the following information from the files:

A "Permit to Install Application", dated May 1997, for a UHP EAF, a LRF, a VTD, a continuous caster and air pollution control upgrade. The application cited a production increase from 404,420 to 570,000 tons of steel per year. The 404,420 figure is based on the most recent 2-year average, ending 8/31/96.

A letter, dated 11/21/86, with "Permit to Operate" information, indicating that EAF #6, #7, #8, and #9 were installed in 1975, with a maximum production of 25 T/hr, and an annual production of 133,000 T/y.

A Title V permit application indicating that production levels for EAF #5, #6, #8, and #9 of 33 T/hr, 289,080 T/y max, 109,507 actual, with a total annual production of 1,156,320 T. This was based on an average heat time of 3 hours, 90% capture of charging and refining emissions, 50% capture of tapping emissions and a 85 T/h LRF.

An application for a permit to install a LRF with an average production rate of 50 T/hr and a maximum capacity of 85 T/ht, which was received by OEPA on 1/25/91.

An application for a "Permit or Variance to Operate" dated 4/11/77, indicating that EAF #5 was installed in 1975, and had a maximum production rate of 25 T/hr, and 133,000 T/y, with a heat time of 240 minutes.

A "Permit to Install" dated 2/12/86, to install oxyfuel burners on EAF #5. The permit required that OEPA rules 17-07, 08, 11, 31-05 and BAT apply to the source, and that the burners could not be used at the same time as melting and refining.

Boiler House - I documented the following information from the files:

A report of a particulate stack test of boiler #1 performed on 9/24/96, by Environmental Quality Management, Cincinnati, OH (513-825-7500). The maximum rated capacity was 63.5 MMBTU/hr. The results were:

<u>Stack</u>	<u>gr/dscf</u>	<u>#/hr</u>	<u>#/MMBTU</u>
East (avg, F-factor)	0.0495	3.572	0.117
(condensibles)	0.00664	0.480	
West (avg, F-factor)	0.0444	2.133	0.102

(condensibles)

0.00421

0.202

A "Permit to Operate an Air Contaminant Source", which expired on 8/31/92, indicating that the OEPA rules applicable to boiler #1 are 17-07, 10, 18-84, 0.19 #TSP/MMBTU input and 4.2 #SO2/MMBTU input. The permit also required that each shipment of coal was to be sampled in accordance with ASTM method D2234.

A report of a particulate stack test of boiler #1 performed on 4/30/92 by Envisage. The results were:

<u>Stack</u>	<u>gr/dscf</u>	<u>#/hr</u>	<u>#/MMBTU</u>
East	0.0280	1.44	0.0626
West	0.0531	2.63	0.0998

Fugitive Dust - I documented the following information from the files:

A report of CSC's Dust Control Program for 1995. The report indicated that 28,000 gallons of dust suppressant solution was used, with a 9:1 dilution ratio, on six days during the year. These days were 7/28, 8/7, 12, 24, 25 and 9/26. The report also showed that there was no precipitation recorded 8/16-31, 9/1-11 or 10/7-19.

A report of CSC's Dust Control Program for 1996. The report indicated that 20,500 gallons of dust suppressant solution was used, with a 9:1 dilution ratio, on two days during the year. These days were 8/27 and 9/11. The report also showed that there was no precipitation recorded 3/8-18, 3/26-31, 4/2-9, 6/25-30, 8/2-7, 10/1-8 or 10/11-17.

A "Permit to Operate", from 10/20/89 to 10/20/92, for paved roadways and parking areas (P001). This permit required water flushing and/or vacuuming once per month, April through October; flushing and/or sweeping paved parking areas as needed with a minimum frequency of twice per year; and minimize or eliminate visible emissions from unpaved areas by resurfacing with gravel or slag and by application of dust suppressant as needed.

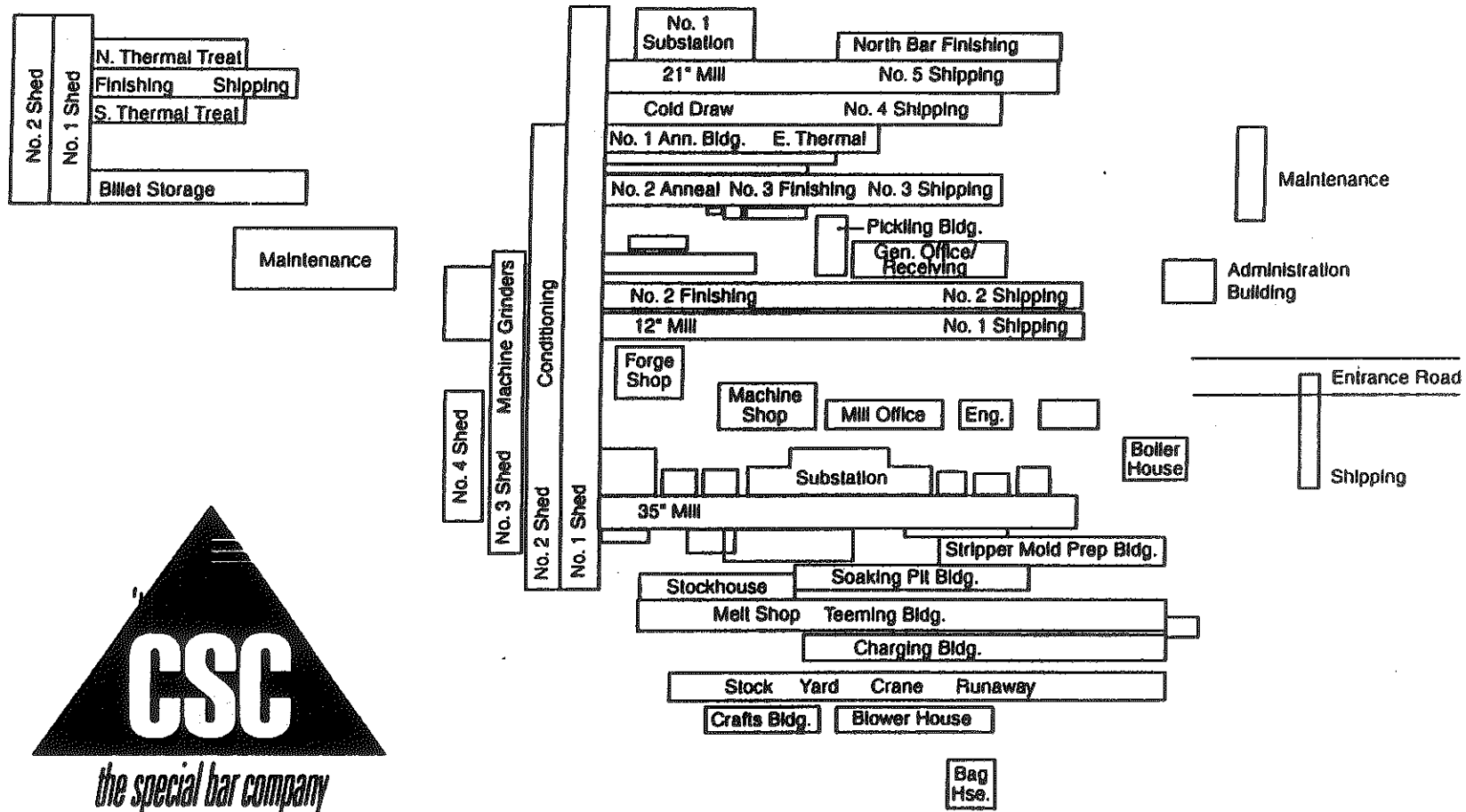
A Profile

The origin of our name goes back to 1915 and the parent company, Copperclad, and its product line — copper-covered steel in the form of rods, wire and wire products. Our plant was originally constructed as an operating division in 1939 to supply steel for the parent company.

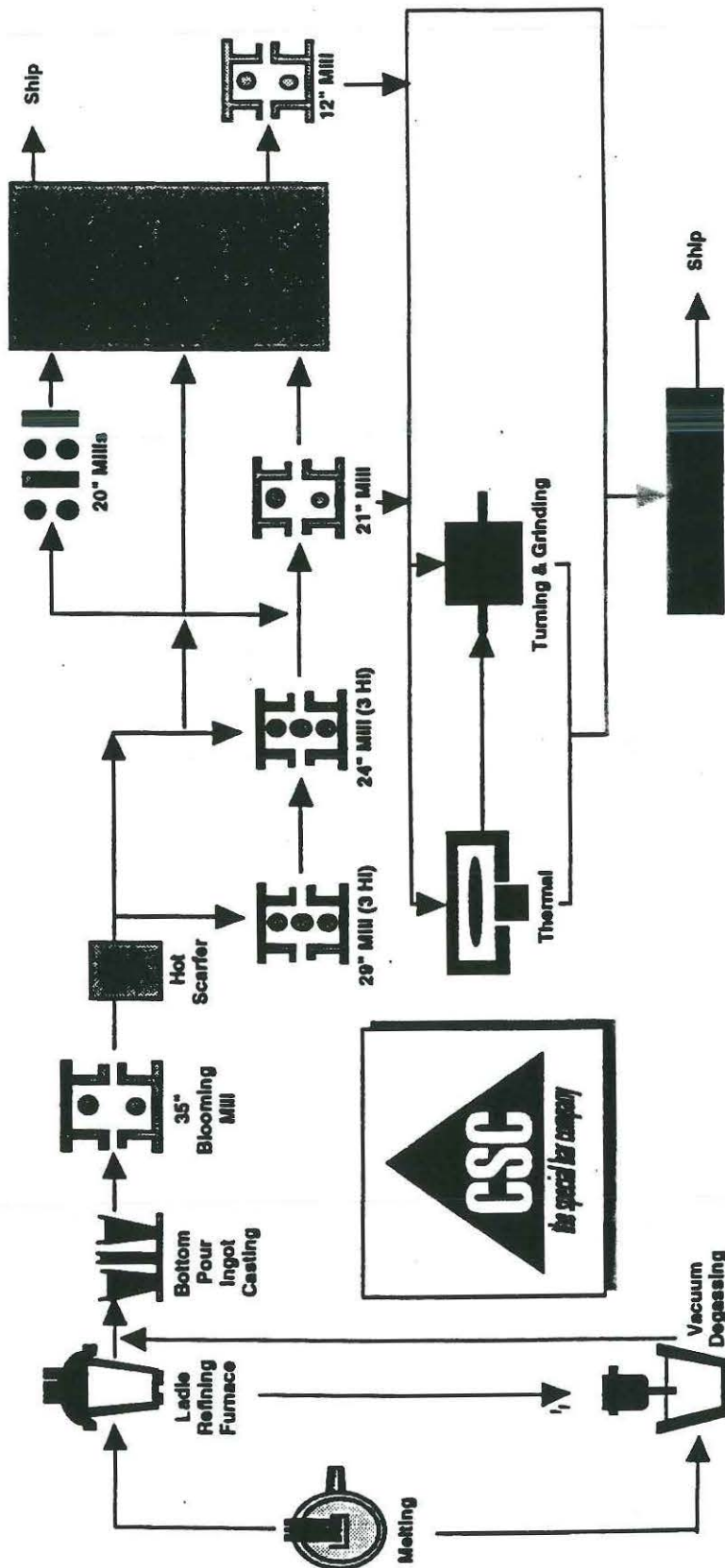
Now known as CSC, we are located on 400 acres in Warren, Ohio, just 65 miles southeast of Cleveland. The facility is a fully integrated electric furnace steel mill with ladle refining, vacuum degassing, bottom pouring, two rolling mills, complete thermal treat facilities, and turn and grind operations.

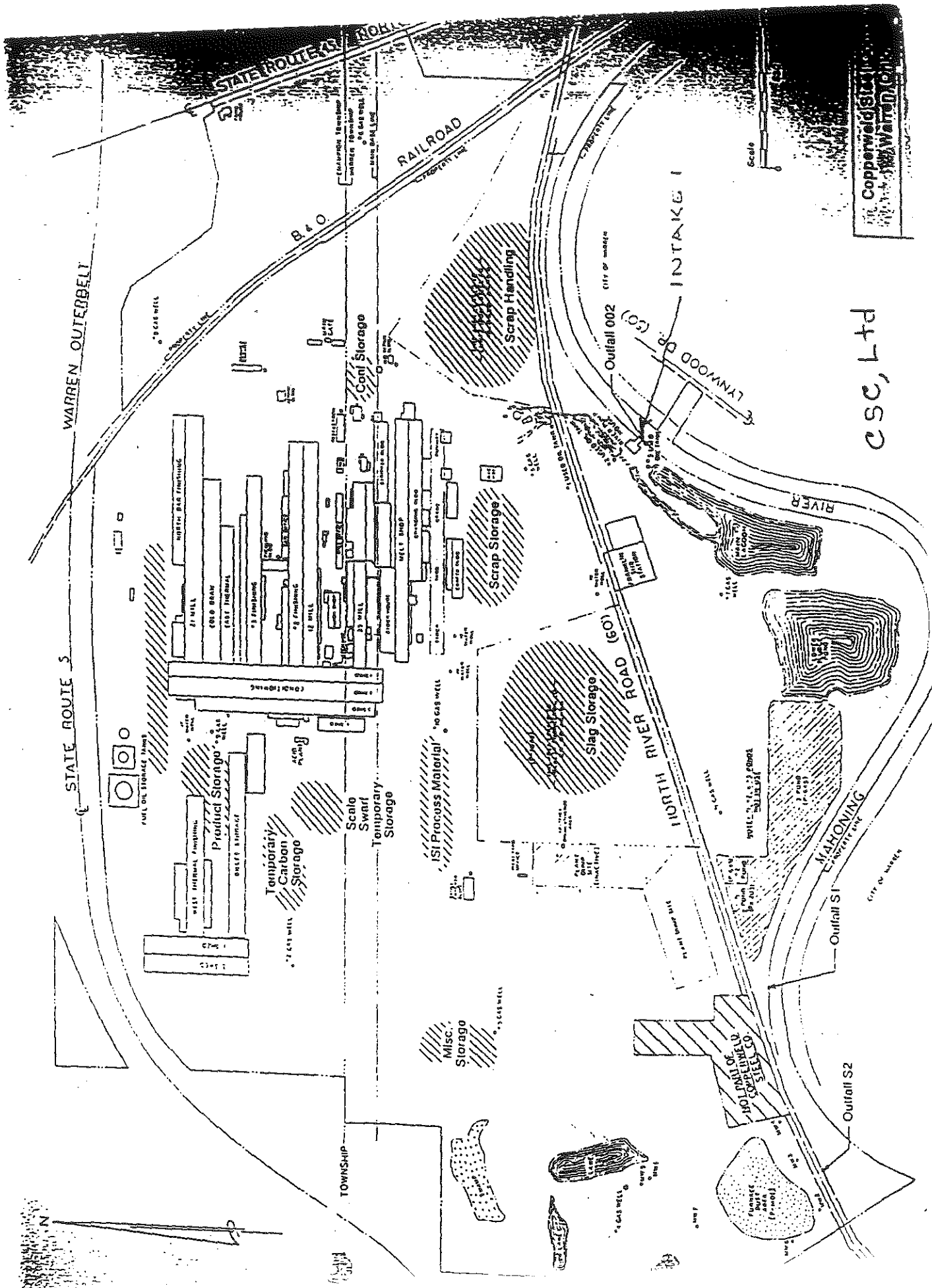
CSC produces quality alloy steel bars for steel service centers (distributors), forgers, automotive suppliers including truck and heavy equipment manufacturers, machinery and industrial equipment suppliers and petroleum, mining and energy related industries.

Plant Layout



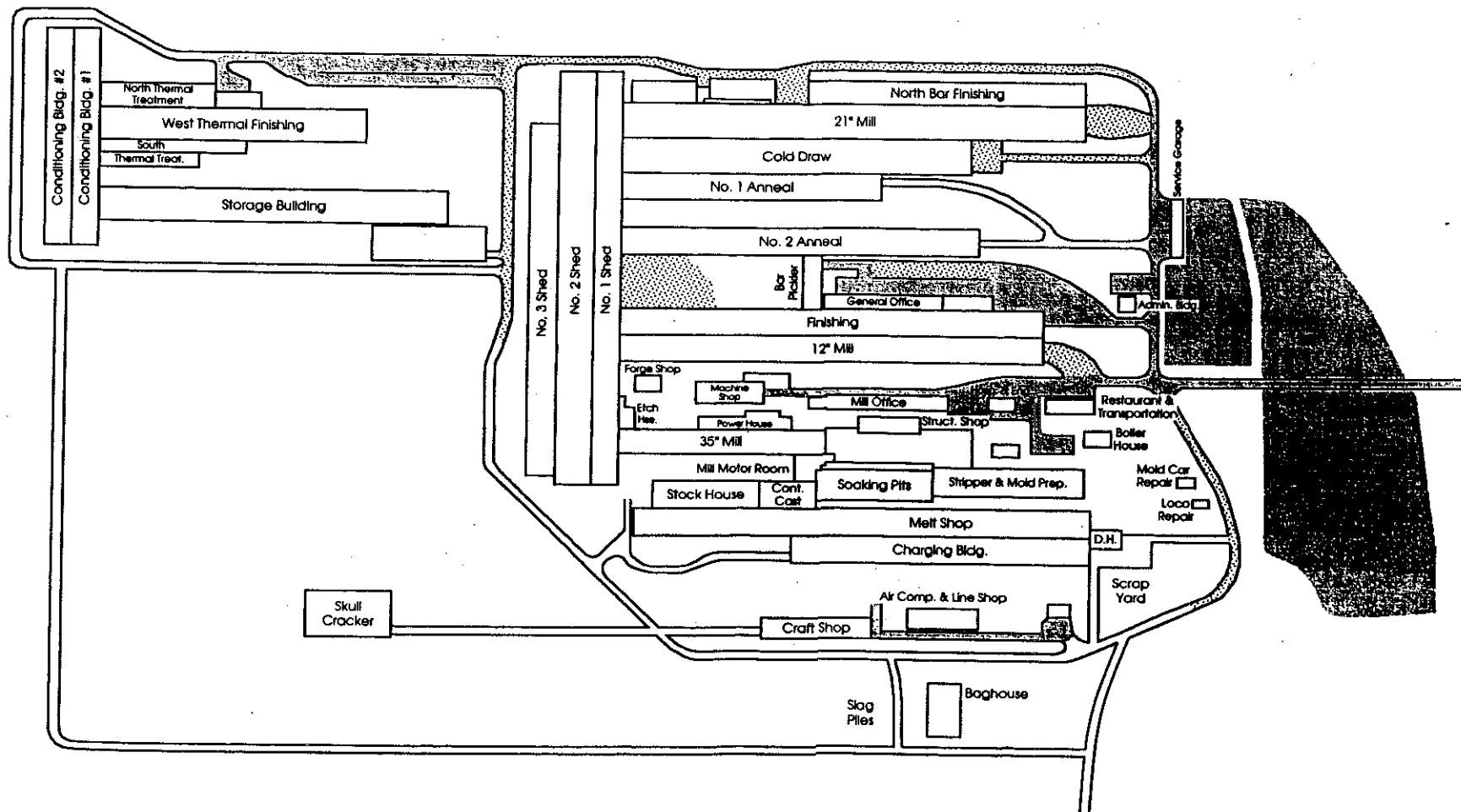
Present Production System



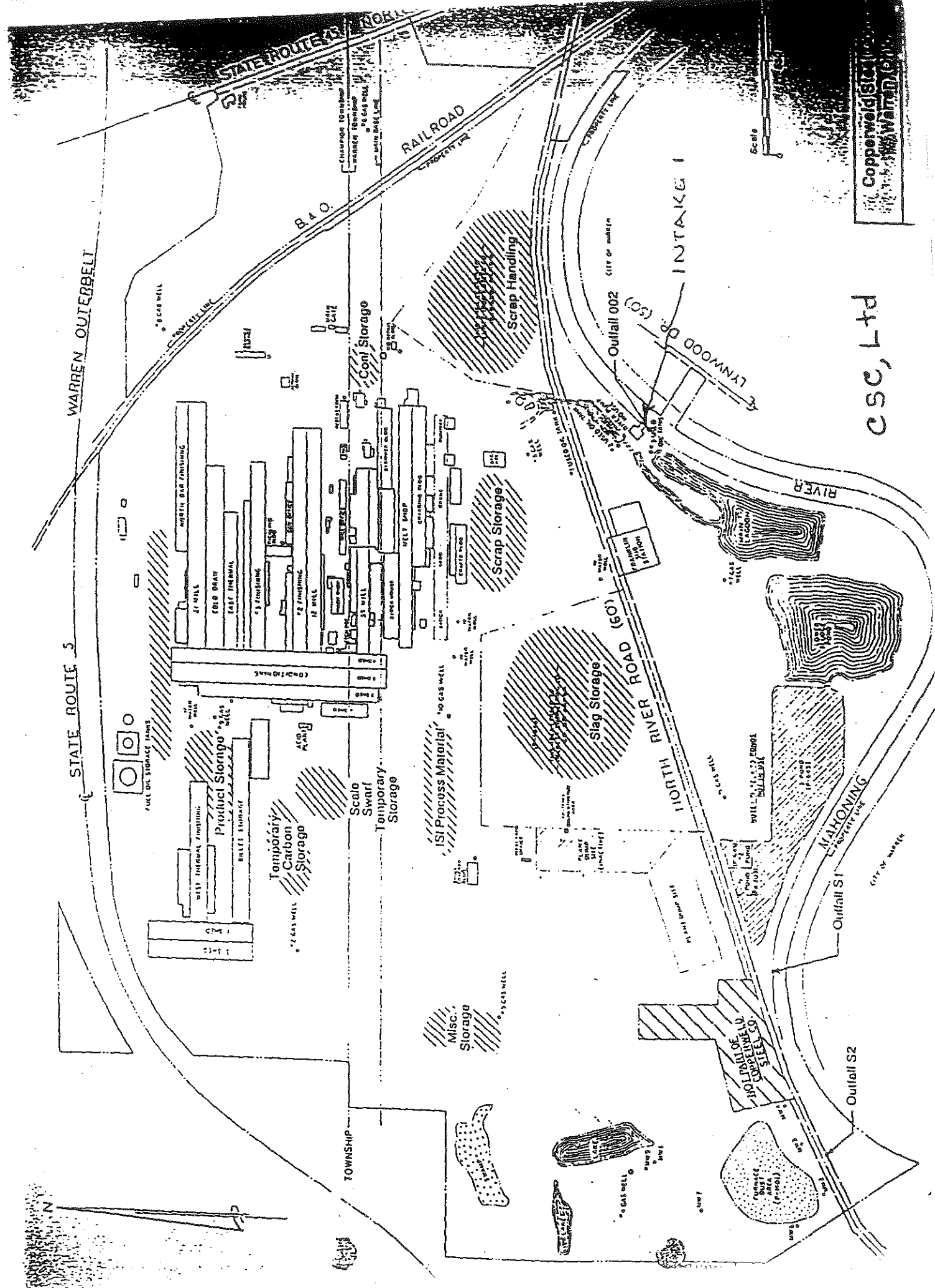


Copperweld Steel Plant
Warren, Ohio

CSC, Ltd



LEGEND		CSC, Ltd.		E-Q
	- Concrete Roads	Facility Layout		
	- Asphalt Roads	Drawing No.:		
	- Unpaved Roads	Scale: NOT TO SCALE		
Drawn: JH		Revision: 0		
Check:		Date: 8/19/96		



Case, Ltd

Copperweld Steel
1-800-888-WATSON (9276)

ATTACHMENT 2

CAA-NESHAP INSPECTION REPORT

(3 Sheets)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

AIR AND RADIATION DIVISION
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

DATE:

AUG 04 1997

SUBJECT: Inspection of CSC Limited, 4000 Mahoning Ave., Warren, Ohio.
on 6-24,25-97- On-Site Review of Records Related to CSC's
Asbestos NESHAP Program

FROM: Jeffrey Bratko, Environmental Scientist J.B.,
AECAB, AECAS (MN-OH)

TO: File

THRU: William MacDowell, Chief W.M.
AECAB, AECAS (MN-OH)

Background

On June 24 and 25, 1997, U.S. EPA conducted a multi-media inspection of CSC Limited (CSC), Warren, Ohio. The inspection was conducted as part of the United States Environmental Protection Agency (U.S. EPA) mini-mill initiative. The full scope of that inspection is not discussed in this report nor are the results of the entire multi-media inspection discussed in this report. This report concerns only that portion of the inspection which covered compliance with the asbestos NESHAP regulations at 40 C.F.R. 61.140-61.157.

There was no asbestos abatement activity observed during the multi-media inspection of the CSC facility. A review of CSC's records related to asbestos abatement did take place on June 25, 1997, at the CSC facility.

Records Review - Records related to asbestos abatement activities were provided for review. A small sample of the records were copied and are attached to this report. According to Jack VanKirk, CSC generally uses the same contractor, Gateway Environmental Contractors, for asbestos abatement needs. Gateway provides CSC with a number of reports and records concerning its asbestos abatement activities at the CSC facility. Many of the reports are not required by the asbestos NESHAP regulations. Those reports that are not required by the asbestos NESHAP will not be reviewed in this report.

A considerable number of records were reviewed on site. A representative small sample were copied and are discussed below.

1. Asbestos Waste Disposal Manifest No. 4070 (see attachment 1).

The manifest was compared with the requirements found at 40 C.F.R. 61.149(e)

- a. 61.149(e) (ii) requires the waste manifest include the name and address of the local, state, or EPA Regional agency responsible for administering the asbestos NESHAP program. The notice does include a slightly incorrect name for the local agency and no address is provided.
 - b. 61.149(e) (v) requires the waste manifest include the name and physical site location of the disposal site. The manifest does report the name of the disposal site. However, the physical location is reported as being "R.D. #2, Box 282 A, Pleasant Valley Road, Irwin, PA".
 - c. 61.149(e) (viii) requires that the waste manifest contain a certification that the contents of this consignment are fully and accurately described by proper shipping name and are classified, packed, marked, and labeled and are in all respects in proper condition for transport by highway according to applicable international and government regulations. Waste manifest No 4070 does not include such a certification.
2. Asbestos Notification of Demolition and Notification signed on 9-30-96 (see attachment 2).
- a. 61.145(b) (4) (ix) requires the notice report the scheduled starting and completion dates of demolition or renovation. The notice does not include such information.
 - b. 61.145(b) (4) (x) requires a description of the planned renovation work to be performed and methods to be employed, including renovation techniques to be used and a description of the affected facility components. The notice does not include this information.
 - c. 61.145(b) (4) (xi) requires a description of work practices and engineering controls to be used to comply with the asbestos NESHAP including asbestos removal and waste-handling emission control procedures. The notice states "Glove bag removal using wet method. Area demarcation and air spraying during removal". That description does not provide all of the information required by 61.145(b) (4) (xi).
 - d. 61.145(b) (4) (xvi) requires a description of the procedures to be followed in the event that unexpected RACM is found or Category II nonfriable ACM becomes crumbled, pulverized, or reduced to powder. The notice reports "All materials will be handled as per applicable regulations and all agencies will be notified". That description does not provide the information required by 61.145(b) (4) (xvi).

Summary of Records Review

The records described above are representative of other waste manifests and asbestos notifications observed on site. Findings, similar to those described above, were made for other waste manifests and notifications reviewed on-site. However, given the limited time available at the site, it was not possible to make a written record of each document reviewed and each finding made. Section 114 authority could be used to obtain the records. More complete records could also be obtained from the Mahoning-Trumbull Air Pollution Control agency.

Review of NARS Violation Data Report

A review of the NARS Violation Data Report for the period covering the second quarter of FY 95 to the first quarter of the FY 97 revealed that Gateway Environmental Construction, the asbestos abatement contractor utilized frequently by CSI, was issued a Notice of Violation (NOV) in the third quarter of 1995, by the local agency in Allegheny County, Pennsylvania. The NOV was issued based on notification deficiencies.

Review of ACTS Records

A limited review of ACTS records was conducted (in Region 5's office). The ACTS data appeared to cover the period from late August 1995 thru part of March 1997. The report did not list any inspections, of the projects conducted by Gateway Environmental Contractors at CSC, by the Mahoning-Trumbull agency.

Review of Region 5's AECAB Files

A review of the list of files for NESHAP sources/cases in Ohio revealed no listing for Gateway Environmental Contractors. The CSC case file contained no documents which discuss or report any asbestos NESHAP compliance issues.

Discussion

During the two day multi-media inspection of CSC only a very limited amount of time was available to discuss asbestos related issues. However, I did ask Jack VanKirk about CSC's oversight of asbestos abatement projects. Mr. VanKirk's response indicated that CSC is doing minimal oversight of asbestos abatement work performed by abatement contractors at its facility. Mr. VanKirk noted that he relies, partially, on inspections performed by both the Ohio Department of Health and the Mahoning-Trumbull Agency, for oversight of abatement contractors. Mr. VanKirk also told me that Gateway Environmental Contractors routinely participates in the planning phases of renovation projects at CSC. That is done so that asbestos issues can be identified and/or anticipated early in the planning process.

Summary

The asbestos NESHAP portion of the multi-media inspection at CSC consisted solely of a records review. The waste manifests reviewed and the asbestos notifications reviewed did not contain all of the information required by 40 C.F.R. 61.145(b) and 61.149(e).

Attachments (2)

cc: ~~Redacted~~
E. Wojciechowski

Standard bcc's: official file copy w/attachment(s)
 originator's file copy w/attachment(s)
 originating organization reading file w/attachment(s)

Other bcc's:

Path/Filename: A:\CSC.REP

Creation Date: July 31, 1997 (3:32pm)

ATTACHMENT 3

CWA-NPDES INSPECTION REPORT

(22 Sheets)

**CSC LTD., WARREN, OHIO
NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)
COMPLIANCE EVALUATION INSPECTION (CEI)**

U.S. Environmental Protection Agency (EPA) Region 5 is conducting a multimedia compliance evaluation initiative for minimills in the region. As part of this initiative, Tetra Tech EM Inc. (formerly, PRC Environmental Management, Inc.) conducted a National Pollutant Discharge Elimination System (NPDES) compliance evaluation inspection (CEI) of the CSC Ltd. facility, in Warren, Ohio. Rob Foster of Tetra Tech inspected the facility on June 24 and 25, 1997, as a member of an EPA multimedia inspection team led by Mark Moloney of EPA's Eastern District Office (EDO). Paul Novak of EDO assisted in the NPDES CEI.

The CSC facility background, inspection procedures, and a summary of CEI findings are discussed below.

FACILITY BACKGROUND

The basis of the CEI is the CSC facility's NPDES permit No. OH0011207 (Ohio No. 3ID00050). The permit was issued on August 5, 1996, and is effective from September 1, 1996, to October 31, 2000. The permit identifies three outfalls: pump house intake strainer backwash water (outfall 003), pumphouse intake traveling screen backwash water (outfall 004), and wastewater treatment plant (WWTP) effluent (outfall 005). Discharge limitations and monitoring requirements are established at outfall 005 for total suspended solids, oil and grease, metals (including thallium, silver, antimony, zinc, lead, copper, and cadmium), and flow rate (see attached Table 1). Any discharges from outfalls 003 and 004 are required to be free from process waste and other contaminants.

The last NPDES CEI of the CSC facility was conducted by Ohio Environmental Protection Agency (OEPA) on December 6, 1996. Key findings are summarized below:

- The old sanitary package plant rendered only limited primary treatment because of a lack of maintenance.
- Ohio Star Forge, a steel forging operation situated on a separate property surrounded by CSC, was discharging wastewater and sewage to the CSC facility even though it no longer has an ownership relationship with CSC and does not have an NPDES permit.

- An unauthorized discharge (bypass) was occurring at the weir located at former NPDES outfall 002. Approximately 50 gallons per minute (gpm) of process and sanitary wastewater was flowing into the Mahoning River.

OEPA issued a notice of violation (NOV) to CSC as a result of the unauthorized discharge during the December 1996 CEI and during follow-up inspections by OEPA on December 16, 1996; January 23, 1997; and February 14, 1997.

INSPECTION PROCEDURES

The CEI consisted of a facility walk-through to identify key wastewater sources and possible unpermitted discharges, inspection of the facility's lagoon system, inspection of the WWTP, interview of the WWTP operator, observation of NPDES compliance sampling, and review of NPDES compliance sampling analytical results and discharge monitoring reports (DMR). Tetra Tech also collected wastewater samples for analysis by EPA's Central Regional Laboratory (CRL). Tetra Tech's observations of facility operations and NPDES compliance sampling activities during the CEI are discussed below.

Facility Operations

CSC uses approximately 21 to 22 million gallons per day (mgd) of process water that is recirculated through a series of three settling lagoons (Ponds A, B, and C). Water is discharged from the system through the WWTP at rates of up to 1.1 mgd. System makeup water is taken from the Mahoning River. Both recycled lagoon water and river water are filtered before pumping to the mill. Backwash water from the lagoon water filter is discharged to the second lagoon (Pond B); backwash water from the river water system is discharged back to the river.

The water level in the lagoon system is controlled by varying the rates of river water intake and WWTP discharge. In response to the NOV, CSC has installed a high-level alarm at the location of former NPDES outfall 002, which now serves as the influent wet well to the WWTP. The alarm causes the river water intake pumps to automatically shut off, and CSC can manually increase the WWTP flow to further reduce the water level.

An oil skimmer is located near the outlet of each lagoon in the system. During the inspection, a contractor was removing additional oil from the third lagoon (Pond C). This operation appeared to be effective. However, the area near the skimmer was stained with oil.

The WWTP was constructed in 1992 and started operating in January 1993. It consists of the following unit processes: flash mixing with ferric chloride, flocculation with polymer addition, clarification, gravity filtration with sand and anthracite mixed media, and gravity sludge thickening. Thickened sludge is disposed of off-site as nonhazardous waste; a sludge filter press is no longer used. CSC is investigating the use of biotreatment technologies to treat sludge from its lagoons for possible reuse as clean fill material.

Influent flow to the WWTP is measured by a magnetic flow meter, and effluent flow is measured by the height over a V-notched weir. During the inspection, influent and effluent flow rates were 240 and 258 gpm, respectively, corresponding to 0.346 and 0.372 mgd, respectively. Permitted contaminant loading rates are based on a flow rate of 1.4 mgd. CSC also continuously monitors effluent pH. During the inspection, effluent pH was within the permitted range of 6.5 to 9.0 standard pH units.

The WWTP has various sumps and level alarms to indicate spills. The sumps can be pumped to the backwash water holding pit whose contents are pumped to Pond B as required. In the event of a major system problem, the WWTP can be shut down and all water can be recycled to the mill.

CSC's WWTP operator conducts routine maintenance activities on monthly, seasonal, and annual bases, according to an operation and maintenance manual provided by the WWTP design engineers. An outside contractor performs monthly maintenance of major equipment. During the inspection, the plant appeared to be well maintained; however, no maintenance records were available.

NPDES Compliance Sampling and Analysis Activities

CSC contracts NPDES compliance sampling and analysis activities to American Analytical Laboratories (AAL). Tetra Tech observed AAL collecting samples during the CEI. A 24-hour, time-composited sample of WWTP effluent was collected for total suspended solids and metals analyses. A grab sample

was collected for oil and grease analysis. AAL measured the temperature and pH of WWTP effluent using a calibrated meter. The composite sample was collected inside a small refrigerator; however, the temperature of the sample was 9.7°C, which exceeds the recommended 4°C. Although not required by CSC's NPDES permit, AAL also collected a grab sample of river water for analysis.

Tetra Tech collected grab samples at outfalls 002 and 005 during the inspection. Tetra Tech also collected a reagent blank. Split samples were provided to CSC. Table 1 compares Tetra Tech sampling and analyses results to NPDES permit requirements. The laboratory analytical reports are included in Attachment 2.

SUMMARY OF FINDINGS

Key findings of Tetra Tech's CEI are summarized below.

- CSC has addressed the prior NOV by installing a high-level alarm system at the location of former outfall 002.
- DMRs indicate that CSC is in compliance with its NPDES permit requirements. Samples collected by Tetra Tech also met permit concentration limitations. However, monthly average concentrations are not calculated on a flow-proportioned basis as required by the permit's general conditions (see definition for "30-day concentration limitation"). CSC should revise its method for calculating monthly average concentrations to comply with permit requirements. It is also recommended (but not required) that CSC request duplicate sample analyses about once per year as a quality control check on analytical results.
- CSC's effluent composite sample should be maintained at a temperature of less than 4°C.
- CSC should maintain WWTP maintenance records that are available for inspection. A written WWTP maintenance schedule should also be available.

TABLE 1
CSC LTD. NDPEs CEI SAMPLING AND ANALYTICAL RESULTS

Parameter	Units	Permit Limitations		EPA Analytical Results			Comments
		30-day	Daily	Outfall 005	Outfall 002	Blank	
Total Suspended Solids (TSS)	mg/L	77	155	<5	9.2	<5	
Oil and Grease (O&G)	mg/L	15	20	2.75	5	1.2	EPA Method 1664
Thallium	ug/L	-	-	<2	<2	<2	GFAA
Silver	ug/L	-	-	<6.0	<6.0	<6.0	ICP
Antimony	ug/L	-	-	<2	4	<2	GFAA
Zinc	ug/L	30	90	<20	68.4	<20	ICP
Lead	ug/L	20	65	<70	<70	<70	ICP
Lead	ug/L	20	65	<2	29	<2	GFAA
Copper	ug/L	18	59	<6.0	22.3	<6.0	ICP
Cadmium	ug/L	8.2	15.2	<10.0	<10.0	<10.0	ICP
Cadmium	ug/L	8.2	15.2	<0.2	<0.2	<0.2	GFAA
Flow Rate	mgd	-	-	0.372	-	-	CSC flow meter

Notes:

mg/L = milligrams per liter

ug/L = micrograms per liter

mgd = million gallons per day

- = not analyzed

ICP = inductively coupled plasma

GFAA = graphite furnace atomic absorption

Other metals analyzed by ICP but not included in permit are not reported.

ATTACHMENT 1

**CSC LTD., WARREN, OHIO
NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)
COMPLIANCE EVALUATION INSPECTION (CEI)
INSPECTION AND CHAIN-OF-CUSTODY FORMS**

(15 Pages)



United States Environmental Protection Agency
Washington, D.C. 20460

Water Compliance Inspection Report

Form Approved.
OMB No. 2040-0057
Approval expires 8-31-98

Section A: National Data System Coding (i.e., PCS)

Transaction Code	NPDES	yr/mo/day	Inspection Type	Inspector	Fac Type
1 <u>N</u> 2 <u>5</u> 3 <u>0</u> <u>H</u> <u>0</u> <u>0</u> <u>1</u> <u>1</u> <u>2</u> <u>0</u> <u>7</u> 11 12 <u>9</u> <u>7</u> <u>0</u> <u>6</u> <u>2</u> <u>4</u> 17 18 <u>M</u> 19 <u>C</u> 20 <u>2</u>					
Remarks					
21 <u>3</u> <u>I</u> <u>D</u> <u>0</u> <u>0</u> <u>0</u> <u>9</u> <u>0</u> 22 23 24 25 26 27 28 29 30 31 32 33 34 35 36 37 38 39 40 41 42 43 44 45 46 47 48 49 50 51 52 53 54 55 56					
Inspection Work Days	Facility Self-Monitoring Evaluation Rating	B1	QA	Reserved	
67 68 69 70 71 72 73 74 75 76 77 78 79 80					

Section B: Facility Data

Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number) <u>CSC Ltd.</u> <u>4000 Mahoning Ave.</u> <u>Warren, OH 44481</u>	Entry Time/Date <u>0800/6-24-97</u>	Permit Effective Date <u>09/01/96</u>
	Exit Time/Date <u>1630/6-25-97</u>	Permit Expiration Date <u>10/31/00</u>
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) <u>Jack Van Kirk</u> <u>Manager, Environmental Affairs</u>	Other Facility Data	
Name, Address of Responsible Official/Title/Phone and Fax Number <div>Contacted <input type="checkbox"/> Yes <input type="checkbox"/> No</div>		

Section C: Areas Evaluated During Inspection (Check only those areas evaluated)

<input checked="" type="checkbox"/> Permit	<input checked="" type="checkbox"/> Flow Measurement	<input type="checkbox"/> Operations & Maintenance	<input type="checkbox"/> CSO/SSO (Sewer Overflow)
<input checked="" type="checkbox"/> Records/Reports	<input checked="" type="checkbox"/> Self-Monitoring Program	<input type="checkbox"/> Sludge Handling/Disposal	<input type="checkbox"/> Pollution Prevention
<input checked="" type="checkbox"/> Facility Site Review	<input checked="" type="checkbox"/> Compliance Schedules	<input type="checkbox"/> Pretreatment	<input checked="" type="checkbox"/> Multimedia
<input checked="" type="checkbox"/> Effluent/Receiving Waters	<input type="checkbox"/> Laboratory	<input type="checkbox"/> Storm Water	<input type="checkbox"/> Other:

Section D: Summary of Findings/Comments (Attach additional sheets of narrative and checklists as necessary)

- 1) now addressed by installing high-level alarm at old outfall 002
- 2) Ave. concentrations on DMRs not calculated using flow proportion formula
- 3) 24-hr composite collected w/in refrigerator at temperature $>4^{\circ}\text{C}$
- 4) Written maintenance records not available

Name(s) and Signature(s) of Inspector(s) <u>Rob Foster</u> <u>[Signature]</u>	Agency/Office/Phone and Fax Numbers <u>PRC Environmental Mgmt. Inc.</u> <u>312-856-8724 / 312-938-0118</u>	Date <u>6/24/97</u>
Signature of Management Q A Reviewer	Agency/Office/Phone and Fax Numbers	Date

INSTRUCTIONS

Section A: National Data System Coding (i.e., PCS)

Column 1: Transaction Code. Use N, C, or D for New, Change, or Delete. All inspections will be *new* unless there is an error in the data entered.

Columns 3-11: NPDES Permit No. Enter the facility's NPDES permit number. (Use the Remarks columns to record the State permit number, if necessary.)

Columns 12-17: Inspection Date. Insert the date entry was made into the facility. Use the year/month/day format (e.g., 94/06/30 = June 30, 1994).

Column 18: Inspection Type. Use one of the codes listed below to describe the type of inspection:

A Performance Audit	L Enforcement Case Support	2 IU Sampling Inspection
B Compliance Biomonitoring	M Multimedia	3 IU Non-Sampling Inspection
C Compliance Evaluation (non-sampling)	P Pretreatment Compliance Inspection	4 IU Toxics Inspection
D Diagnostic	R Reconnaissance	5 IU Sampling Inspection with Pretreatment
E Corps of Engineers Inspection	S Compliance Sampling	6 IU Non-Sampling Inspection with Pretreatment
F Pretreatment Follow-up	U IU Inspection with Pretreatment Audit	7 IU Toxics with Pretreatment
G Pretreatment Audit	X Toxics Inspection	
I Industrial User (IU) Inspection	Z Sludge	

Column 19: Inspector Code. Use one of the codes listed below to describe the *lead agency* in the inspection.

C — Contractor or Other Inspectors (Specify in Remarks columns)	N — NEIC Inspectors
E — Corps of Engineers	R — EPA Regional Inspector
J — Joint EPA/State Inspectors—EPA Lead	S — State Inspector
	T — Joint State/EPA Inspectors—State lead

Column 20: Facility Type. Use one of the codes below to describe the facility.

- 1 — Municipal. Publicly Owned Treatment Works (POTWs) with 1987 Standard Industrial Code (SIC) 4952.
- 2 — Industrial. Other than municipal, agricultural, and Federal facilities.
- 3 — Agricultural. Facilities classified with 1987 SIC 0111 to 0971.
- 4 — Federal. Facilities identified as Federal by the EPA Regional Office.

Columns 21-66: Remarks. These columns are reserved for remarks at the discretion of the Region.

Columns 67-69: Inspection Work Days. Estimate the total work effort (to the nearest 0.1 work day), up to 99.9 days, that were used to complete the inspection and submit a QA reviewed report of findings. This estimate includes the accumulative effort of all participating inspectors; any effort for laboratory analyses, testing, and remote sensing; and the billed payroll time for travel and pre and post inspection preparation. This estimate does not require detailed documentation.

Column 70: Facility Evaluation Rating. Use information gathered during the inspection (regardless of inspection type) to evaluate the quality of the facility self-monitoring program. Grade the program using a scale of 1 to 5 with a score of 5 being used for very reliable self-monitoring programs, 3 being satisfactory, and 1 being used for very unreliable programs.

Column 71: Biomonitoring Information. Enter D for static testing. Enter F for flow through testing. Enter N for no biomonitoring.

Column 72: Quality Assurance Data Inspection. Enter Q if the inspection was conducted as followup on quality assurance sample results. Enter N otherwise.

Columns 73-80: These columns are reserved for regionally defined information.

Section B: Facility Data

This section is self-explanatory except for "Other Facility Data," which may include new information not in the permit or PCS (e.g., new outfalls, names of receiving waters, new ownership, and other updates to the record).

Section C: Areas Evaluated During Inspection

Check only those areas evaluated by marking the appropriate box. Use Section D and additional sheets as necessary. Support the findings, as necessary, in a brief narrative report. Use the headings given on the report form (e.g., Permit, Records/Reports) when discussing the areas evaluated during the inspection. The heading marked "Multimedia" may indicate medias such as CAA, RCRA, and TSCA. The heading marked "Other" may indicate activities such as SPCC, BMPs, and concerns that are not covered elsewhere.

Section D: Summary of Findings/Comments

Briefly summarize the inspection findings. This summary should abstract the pertinent inspection findings, not replace the narrative report. Reference a list of attachments, such as completed checklists taken from the NPDES Compliance Inspection Manuals and pretreatment guidance documents, including effluent data when sampling has been done. Use extra sheets as necessary.

NPDES No. OH 0011207 / OHIO # 3 ID 00050

Facility Name CSC Ltd.

City and State Warren, Ohio

Date of Inspection June 24 & 25, 1997

RECORDS, REPORTS, AND SCHEDULES CHECKLIST

A. PERMIT VERIFICATION

YES	NO	N/A	INSPECTION OBSERVATION CONTAINED IN PERMIT
✓			1. Correct name and mailing address of permittee.
✓			2. Facility is as described in permit.
✓			3. Notification has been given to EPA/State of new, different, increased discharges.
✓			4. Accurate records of influent volume are maintained, when appropriate.
✓			5. Number and location of discharge points are as described in the permit.
✓			6. Name and location of receiving waters are correct.
✓			7. All discharges are permitted.

B. RECORDKEEPING AND REPORTING EVALUATION

			RECORDS AND REPORTS ARE MAINTAINED AS REQUIRED BY PERMIT
✓			1. All required information is available, complete, and current; and
✓			2. Information is maintained for required period.
✓			3. Analytical results are consistent with the data reported on the IMR's.
			4. Sampling and Analysis Data are adequate and include:
✓			a. Dates, times, location of sampling
✓			b. Name of individual performing sampling
✓			c. Analytical methods and techniques
✓			d. Results of analysis
✓			e. Dates of analysis
✓			f. Name of person performing analysis
		✓	g. Instantaneous flow at grab sample stations
			5. Monitoring records are adequate and include
✓			a. (Flow) (pH) D.O., etc. as required by permit <i>strip charts</i>
✓			b. Monitoring charts
		✓	6. Laboratory equipment calibration and maintenance records are adequate.
			7. Plant Records are adequate* and include
✓			a. O&M Manual
✓			b. "As-built" engineering drawings
	✓		c. Schedules and dates of equipment maintenance and repairs
✓			d. Equipment supplies manual
		✓	e. Equipment data cards

* Required only for facilities built with Federal construction grant funds.

RECORDS, REPORTS, AND SCHEDULES CHECKLIST

B. Recordkeeping and Reporting Evaluation (continued)

YES	NO	N/A	8. Pretreatment records are adequate and included:
			a. Industrial Waste Ordinance (or equivalent documents)
			b. Inventory of industrial waste contributors, including:
			1. Compliance records
			2. User charge information
			9. SPCC properly completed, when required.
			10. Best Management Practices Program available, when required.

C. Compliance Schedule Status Review

			THE PERMITEE IS MEETING THE COMPLIANCE SCHEDULE
			1. The permittee has obtained necessary approvals to begin construction.
			2. Financing arrangements are completed.
			3. Contracts for engineering services has been executed.
			4. Design plans and specifications have been completed.
			5. Construction has begun.
			6. Construction is on schedule.
			7. Equipment acquisition is on schedule.
			8. Construction has been completed.
			9. Start-up has begun.
			10. The permittee has requested an extension of time.
			11. The permittee has met compliance schedule.

RECORDS, REPORTS, AND SCHEDULES CHECKLIST

D. POTW Pretreatment Requires Review

YES	NO	N/A	THE FACILITY IS SUBJECT TO PRETREATMENT REQUIREMENTS
			1. Status of POTW Pretreatment Program
			a. The POTW Pretreatment Program has been approved by EPA. (If not, is approval in progress? _____)
			b. The POTW is in compliance with the Pretreatment Program Compliance Schedule. (If not, what is due, and intent of the POTW to remedy)
			2. Status of Compliance with Categorical Pretreatment Standards.
			a. How many industrial users of the POTW are subject to Federal or State Pretreatment Standards? _____
			b. Are these industries aware of their responsibility to comply with applicable standards?
			c. Have baseline monitoring reports (403.12) been submitted for these industries?
			i. Have categorical industries in noncompliance (on EMR reports) submitted compliance schedules?
			ii. How many categorical industries on compliance schedules are meeting the schedule deadlines? _____
			d. If compliance deadlines has passed, have all industries submitted 90 day compliance reports?
			e. Are all categorical industries submitting the required semiannual report?
			f. Are all new industrial discharges in compliance with new source pretreatment standards?
			g. Has the POTW submitted its annual pretreatment report?
			h. Has the POTW taken enforcement action against noncomplying industrial users?
			i. Is the POTW conducting inspections of industrial contributors?
			3. Are the industrial users subject to Prohibited Limits (403.5) and local limits more stringent than EPA in compliance? (If not, explain why, including need for revision limits.)

FACILITY SITE REVIEW CHECKLIST

YES	NO	N/A	
	<input checked="" type="checkbox"/>		1. Standby power or other equivalent provision is provided.
<input checked="" type="checkbox"/>			2. Adequate alarm system for power or equipment failures is available.
		<input checked="" type="checkbox"/>	3. POTW handles and disposes of sludge according to applicable Federal, State, and local regulators.
	<input checked="" type="checkbox"/>		4. All treatment units, other than back-up units, are in service. <i>H₂SO₄ system } not - filter press } needed</i>
<input checked="" type="checkbox"/>			5. Procedures for facility operation and maintenance exist.
	<input checked="" type="checkbox"/>		6. Organization plan (chart) for operation and maintenance is provided.
<input checked="" type="checkbox"/>			7. Operating schedules are established. <i>24 hrs./day, 7 days/wk operator 6 days/wk plus on-call</i>
<input checked="" type="checkbox"/>			8. Emergency plan for treatment control is established. <i>(not written)</i>
			9. Operating management control documents are current and include:
	<input checked="" type="checkbox"/>		a. Operating report
<input checked="" type="checkbox"/>			b. Work schedule
		<input checked="" type="checkbox"/>	c. Activity report (time cards)
			10. Maintenance record system exists and includes:
	<input checked="" type="checkbox"/>		a. As-built drawings
	<input checked="" type="checkbox"/>		b. Shop drawings
	<input checked="" type="checkbox"/>		c. Construction specifications
	<input checked="" type="checkbox"/>		d. Maintenance history
	<input checked="" type="checkbox"/>		e. Maintenance costs
<input checked="" type="checkbox"/>			11. Adequate number of qualified operators are on hand. <i>1 + backup</i>
<input checked="" type="checkbox"/>			12. Established procedures are available for training new operators. <i>use op. manual</i>
<input checked="" type="checkbox"/>			13. Adequate spare parts and supplies inventory and major equipment specifications are maintained. <i>belts, filters, oil, etc.; spare pumps</i>
<input checked="" type="checkbox"/>			14. Instruction files are kept for operation and maintenance of each item of major equipment.
<input checked="" type="checkbox"/>			15. Operation and maintenance manual is available.
		<input checked="" type="checkbox"/>	16. Regulatory agency was notified of bypassing. (Dates _____)

FACILITY SITE REVIEW CHECKLIST

YES	NO	N/A	
			17. Hydraulic and/or organic overloads are experienced. Reason for overloads _____ _____ _____ _____
	✓		18. Up-to-date equipment repair records are maintained.
		✓	19. Dated tags show out of service equipment.
		NE	20. Routine and preventive maintenance are scheduled, performed on time.

PERMITTEE SAMPLING INSPECTION CHECKLIST

A. Permittee Sampling Evaluation

YES	NO	N/A	
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1. Samplings are taken at sites specified in permit.
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	2. Locations are adequate for representative samples.
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	3. Flow proportioned samples are obtained where required by permit. <i>not flow proportioned</i>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	4. Sampling and analysis completed on parameters specified by permit.
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	5. Sampling and analysis done in frequency specified by permit.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	6. Permittee is using method of sample collection required by permit. Required Method: _____ If not, method being used is: <input type="checkbox"/> Grab <input type="checkbox"/> Manual composite <input checked="" type="checkbox"/> Automatic composite
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	7. Sample collection procedures are adequate:
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	a. Samples refrigerated during compositing <i>but Temp = 9.7°C</i>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	b. Proper preservation technique used
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	c. Container and sample holding times before analyses conform with 40 CFR 136.3
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	8. Monitoring and analyses are performed more often than required by permit. If so, results reported in permittee's self-monitoring report. <i>π</i>

B. Sampling Inspection Procedures and Observations

<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1. Grab samples obtained
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	2. Composite sample obtained Composite frequency _____ Preservation _____
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	3. Sample refrigerated during compositing.
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	4. Flow proportioned sample obtained.
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	5. Sample obtained from facility sampling device. <i>grab sampled into jar</i>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	6. Sample representative of volume and nature of discharge.
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	7. Sample split with permittee.
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	8. Chain of custody procedures employed.

* Analyze additional samples (river influent & flow bay) but not reported
NE. Not evaluated

FLOW MEASUREMENT

A. Flow Measurement Inspection Checklist-General

YES	NO	N/A	1. Primary flow measurement device is properly installed and maintained.
✓			2. Flow records are properly kept.
		✓	3. Sharp drops or increases in flow value are accounted for.
✓			4. Actual flow discharge is measured.
✓			5. Influent flow is measured before all return lines. <i>at pump house</i>
✓			6. Effluent flow is measured after all lines.
✓			7. Secondary instruments (totalizers, recorders, etc.) are properly operated and maintained.
		✓	8. Spare parts are stocked.

B. Flow Measurement Inspection Checklist-Flumes

		✓	1. Flow entering flume appears reasonably well distributed across the channel and free of turbulence, boils, or other distortions.
			2. Cross-section velocities at entrance are relatively uniform.
<i>JP</i>	<i>NA</i>		3. Flume is clean and is free of debris or deposits.
			4. All dimensions of flume are accurate.
			5. Side walls of flume are vertical and smooth.
			6. Sides of flume throat are vertical and parallel.
			7. Flume head is being measured at proper location.
			8. Measurement of flume head is zeroed to flume crest.
			9. Flume is of proper size to measure range of existing flow.
			10. Flume is operating under free-flow conditions over existing range of flows.

FLOW MEASUREMENT

C. Flow Measurement Inspection Checklist - Weirs

			1. What type of weir is being used?
YES	NO	N/A	2. The weir is exactly level.
✓			3. The weir plate is plumb and its top edges are sharp and clean.
✓			4. There is free access for air below the nappe of the weir.
✓			5. Upstream channel of weir is straight for at least four times the depth of water level, and free from disturbing influences.
✓			6. The stilling basin of the weir is of sufficient size and clear of debris.
✓			7. Head measurements are properly made by facility personnel.
		✓	8. Proper flow tables are used by facility personnel.

D. Flow Measurement Inspection Checklist - Other Flow Devices

			1. Type of flowmeter used: _____
			2. What are the most common problems that the operator has had with the flowmeter? _____ _____
			3. Measure Wastewater flow: _____ mgd; Recorded flow: _____ mgd; Error _____ %
			4. Design flow: _____ mgd.
			5. Flow totalizer is properly calibrated.
			6. Frequency of routine inspection by proper operator: _____ /day.
			7. Frequency of maintenance inspections by plant personnel: _____ /year.
			8. Frequency of flowmeter calibration: _____ /month.
			9. Flow measurement equipment adequate to handle expected ranges of flow rates.
			10. Venturi meter is properly installed and calibrated.
			11. Electromagnet flowmeter is properly calibrated.

LABORATORY QUALITY ASSURANCE CHECKLIST

A. General

YES	NO	N/A	1. Written laboratory quality assurance manual is available.
-----	----	-----	--

B. Laboratory Procedures

			1. EPA approved analytical testing procedures are used.
			2. If alternative analytical procedures are used, proper approval has been obtained.
			3. Calibration and maintenance of instruments and equipment is satisfactory.
			4. Quality control procedures are used.
			5. Quality control procedures are adequate.
			6. Duplicate sample are analyzed _____ % of time.
			7. Spiked samples are used _____ % of time.
			8. Commercial laboratory is used: Name: _____ Address: _____ Contact: _____ Phone: _____

C. Laboratory Facilities and Equipment

			1. Proper grade distilled water is available for specific analysis.
			2. Dry, uncontaminated compressed air is available.
			3. Fume hood has enough ventilation capacity.
			4. The laboratory has sufficient lighting.
			5. Adequate electrical sources are available.
			6. Instruments/equipment are in good condition.
			7. Written requirements for daily operation of instruments are available.

LABORATORY QUALITY ASSURANCE CHECKLIST (continued)

C. Laboratory Facilities and Equipment (continued)

YES	NO	N/A	
			8. Standards are available to perform daily check procedures.
			9. Written trouble-shooting procedures for instruments are available.
			10. Schedule for required maintenance exists.
			11. Proper volumetric glassware is used.
			12. Glassware is properly cleaned.
			13. Standard reagents and solvents are properly stored.
			14. Working standards are frequently checked.
			15. Standards are discarded after shelf life has expired.
			16. Background reagents and solvents run with every series of samples.
			17. Written procedures exist for cleanup, hazardous response methods, and applications of correction methods for reagents and solvents.
			18. Gas cylinders are replaced at 100-200 psi.

D. Laboratory's Precision, Accuracy, and Control Procedures

			1. A minimum of seven replicates is analyzed for each type of control check and this information is on record.
			2. Plotted precision and accuracy control charts are used to determine whether valid, questionable, or invalid data are being generated from day to day.
			3. Control samples are introduced into the train of actual samples to ensure that valid data is being generated.
			4. The precision and accuracy of the analyses are good.

LABORATORY QUALITY ASSURANCE CHECKLIST (continued)

E. Data Handling and Reporting

YES	NO	N/A	
			1. Round-off rules are uniformly applied.
			2. Significant figures are established for each analysis.
			3. Provision for cross-checking calculations is used.
			4. Correct formulas are used to reduce to simplest factors for quick, correct calculations.
			5. Control chart approach and statistical calculations for quality assurance and report are available and followed.
			6. Report forms have been developed to provide complete data documentation and permanent records and to facilitate data processing.
			7. Data are reported in proper form and units.
			8. Laboratory records are kept readily available to regulatory agency for required period of time.
			9. Laboratory notebook or preprinted data forms are permanently bound to provide good documentation.
			10. Efficient filing system exists enabling prompt channeling of report copies.

F. Laboratory Personnel

			1. The analyst has appropriate training
			2. The analyst follows the specified procedures
			3. The analyst is skilled in performing analyses

Activity Code:

[illegible]

ATTACHMENT 2

**CSC LTD., WARREN, OHIO
NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)
COMPLIANCE EVALUATION INSPECTION (CEI)**

ANALYTICAL REPORTS

(21 Pages)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5 CENTRAL REGIONAL LABORATORY

536 SOUTH CLARK STREET

CHICAGO, ILLINOIS 60605

Date: JUL 28 1997

Subject: Review of Region 5 Data for CSC LTD

From: Charles T. Elly, Director *Chuck Elly*
Region 5 Central Regional Laboratory

To: PRC

Attached are the results for CSC LTD

CRL request number 970310

for analyses for **Total Suspended Solids (TSS)**

Results are reported for sample designations: 97KR03S01, 97KR03S02, and 97KR03R06

Results Status:

- ☒ (X) Acceptable for Use:
- ☐ () Data Qualified, but Acceptable for use:
- ☐ () Data Unacceptable for Use:

- ☐ () Sewer Disposal Criteria Met;

Summary and Comments on Data Quality by Reviewer:

All the water samples submitted for TSS analysis were assayed and the results are attached. Required quality control criteria for the laboratory, method, and system performance audits were evaluated and determined to be within the limits.

Comments on Sample Results:

All the sample results are acceptable for use.

Comments by Laboratory Director or Quality Control Coordinator:

Francis A. Awanya

7/25/97

Review and Date

☒ Reviewed () Unreviewed

John Mon

25 July 87

Team Leader and Date

☒ Reviewed () Unreviewed

Chuck Eddy

7/20/97

QC Coordinator and Date

() Reviewed ☒ Unreviewed

Sylvia Griffin

JUL 28 1997

Data Management Coordinator and Date Received

Date Transmitted JUL 28 1997

Please sign and date this form below and return it with any comments to:

Sylvia Griffin
Data Management Coordinator
Region 5 Central Regional Laboratory
SL - 10C

ENVIRONMENTAL PROTECTION AGENCY
REGION V
CENTRAL REGIONAL LABORATORY
FINAL RESULT REPORT FOR THE TEAM: MINERAL/NUTRIENTS

DIVISION/BRANCH: RCRA SAMPLING DATE: 06/25/97 LAB ARRIVAL DATE: 06/26/97 DUE DATE: 07/17/97
DU NUMBER: BFE DATASET NUMBER: 970310 STUDY: CSC LTD PRIORITY: Routine LABORATORY: CRL

SAMPLE #	CRL LOG NUMBER	SAMPLE DESCRIPTION	TOTAL SUSPENDED SOLIDS IN WATER (mg TSS/L)				
1	97KR03S01		5 U				
2	97KR03S02		9.2				
3	97KR03R06		5 U				
DATE OF ANALYSIS			06/30/97				
ANALYST			AR				

Reviewed by: Francis A. Arwanya Date: 7/25/97

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY



REGION 5 CENTRAL REGIONAL LABORATORY

536 SOUTH CLARK STREET

CHICAGO, ILLINOIS 60605

Date: *JUL 17 1997*

Subject: Review of Region 5 Data for CSC Ltd.

From: Charles T. Elly, Director *Chuck E Elly*
Region 5 Central Regional Laboratory

To:

Attached are the results for CSC Ltd.

CRL request number 970310

for analyses for ICP

Results are reported for sample designations: 97KR03S01, 97KR03S02 and 97KR03R06

Results Status:

- ☒ (x) Acceptable for Use
- ☐ () Data Qualified, but Acceptable for use
- ☐ () Data Unacceptable for Use

Comments on Data Quality by Reviewer

Zinc was reported with a detection limit of 20 µg/L. MDL data and blank studies have shown that this detection limit can be lowered from the previous level. Because of the permit level of 30 µg/L for zinc, this change was made for this survey. Silver matrix spike recovery was high (125%), outside the CRL acceptance limits of 100±15%. All silver results are below detection, so the data are unaffected. Lithium blanks were -16 µg/L, indicating a negative baseline drift. Lithium data are likely biased low between 10 and 20 µg/L. Antimony, cadmium, lead and thallium will not be analyzed by GFAA for these samples at the request of Water Division.

Comments by Laboratory Director or Quality Control Coordinator

Review Record for CSC Ltd.

[Signature] 17 July 97
Peer/Task Monitor Review and Date (☒) Reviewed () Unreviewed

[Signature] 17 July 97
Team Leader and Date (☒) Reviewed () Unreviewed

Chuck E. lb 7/17/97
QC Coordinator and Date () Reviewed (☒) Unreviewed
(position vacant)

Sylvia Griffin
Data Management Coordinator and Date Received

Date Transmitted **JUL 17 1997**

Please sign and date this form below and return it with any comments to:

Sylvia Griffin
Data Management Coordinator
Region 5 Central Regional Laboratory
ML - 10C

Received by and Date

Comments:

Sample 970310
Date analyzed 07/11/97

SAMPLE REPORT
97KR03S01
Correction 1.22000

SITE: CSC Ltd
File name RUN774

Element	Concentration	Units
Aluminum	80.0 U	micrograms/liter
Barium	17.0	micrograms/liter
Beryllium	1.0 U	micrograms/liter
Boron	299.	micrograms/liter
Cadmium	10.0 U	micrograms/liter
Calcium	60200.	micrograms/liter
Chromium	10.0 U	micrograms/liter
Cobalt	6.0 U	micrograms/liter
Copper	6.0 U	micrograms/liter
Iron	87.0	micrograms/liter
Lead	70.0 U	micrograms/liter
Lithium	71.3	micrograms/liter
Magnesium	14000.	micrograms/liter
Manganese	952.	micrograms/liter
Molybdenum	683.	micrograms/liter
Nickel	34.0	micrograms/liter
Silver	6.0 U	micrograms/liter
Sodium	125000.	micrograms/liter
Strontium	411.	micrograms/liter
Titianium	25.0 U	micrograms/liter
Vanadium	5.0 U	micrograms/liter
Zinc	20.0 U	micrograms/liter

run
17 July 97

KMS
7 15 97

Sample 970310 SAMPLE REPORT SITE: CSC Ltd
Date analyzed 07/11/97 97KR03S02 Correction 1.22000 File name RUN774

Element	Concentration	Units
Aluminum	97.2	micrograms/liter
Barium	25.2	micrograms/liter
Beryllium	1.0 U	micrograms/liter
Boron	290.	micrograms/liter
Cadmium	10.0 U	micrograms/liter
Calcium	52200.	micrograms/liter
Chromium	10.0 U	micrograms/liter
Cobalt	6.0 U	micrograms/liter
Copper	22.3	micrograms/liter
Iron	590.	micrograms/liter
Lead	70.0 U	micrograms/liter
Lithium	69.3	micrograms/liter
Magnesium	14000.	micrograms/liter
Manganese	143.	micrograms/liter
Molybdenum	744.	micrograms/liter
Nickel	36.6	micrograms/liter
Silver	6.0 U	micrograms/liter
Sodium	123000.	micrograms/liter
Strontium	405.	micrograms/liter
Titianium	25.0 U	micrograms/liter
Vanadium	5.0 U	micrograms/liter
Zinc	68.4	micrograms/liter

17 July 97

*KMS
7 15 97*

Sample 970310

Date analyzed 07/11/97

SAMPLE REPORT

97KR03R06

Correction

1.22000

SITE: CSC Ltd

File name RUN774

Element	Concentration	Units
Aluminum	80.0 U	micrograms/liter
Barium	6.0 U	micrograms/liter
Beryllium	1.0 U	micrograms/liter
Boron	80.0 U	micrograms/liter
Cadmium	10.0 U	micrograms/liter
Calcium	500. U	micrograms/liter
Chromium	10.0 U	micrograms/liter
Cobalt	6.0 U	micrograms/liter
Copper	6.0 U	micrograms/liter
Iron	80.0 U	micrograms/liter
Lead	70.0 U	micrograms/liter
Lithium	10.0 U	micrograms/liter
Magnesium	100. U	micrograms/liter
Manganese	5.0 U	micrograms/liter
Molybdenum	15.0 U	micrograms/liter
Nickel	20.0 U	micrograms/liter
Silver	6.0 U	micrograms/liter
Sodium	1000. U	micrograms/liter
Strontium	10.0 U	micrograms/liter
Titanium	25.0 U	micrograms/liter
Vanadium	5.0 U	micrograms/liter
Zinc	20.0 U	micrograms/liter

17 July 97

KMS

7 15 97



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5 CENTRAL REGIONAL LABORATORY

536 SOUTH CLARK STREET

CHICAGO, ILLINOIS 60605

Date: JUL 15 1997

Subject: Review of Region 5 Data for AFE 970310 CSC LTD

From: Charles T. Elly, Director

Region 5 Central Regional Laboratory

A handwritten signature in black ink, appearing to read "Chuck E. Elly", is written over the printed name and title of the sender.

To:

Attached are the results for AFE 970310 CSC LTD

CRL request number 970310

for analyses for OIL & GREASE

Results are reported for sample designations: 97KR03S01, 97KR03S02, 97KR03R06

Results Status:

(X) Acceptable for Use

() Data Qualified, but Acceptable for use

() Data Unacceptable for Use

Comments on Data Quality by Reviewer

Spike & spike duplicate % recoveries (ongoing precision & recovery) are 90.5 & 81.8 % , with a RPD of 10.2 % , within Method 1664 acceptance criterion of 79 - 114%. The HEM results for all three site samples were < 5 mg/L. Data are acceptable for use.

Comments by Laboratory Director or Quality Control Coordinator

Review Record for AFE 970310 CSC LTD

Erlinda Evangelista 7/15/97

E. Evangelista 7/15/97

Task Monitor/Peer Review and Date

(X) Reviewed () Unreviewed

Chi M. Tang

Chi M. Tang

7/15/97

Team Leader and Date

(X) Reviewed () Unreviewed

VACANT.

Chuck Ellis

7/15/97

QC Coordinator and Date

() Reviewed (X) Unreviewed

Sylvia Griffin

JUL 15 1997

Data Management Coordinator and Date Received

Date Transmitted JUL 15 1997

Please sign and date this form below and return it with any comments to:

Sylvia Griffin
Data Management Coordinator
Region 5 Central Regional Laboratory
SL - 10C

Received by and Date

Comments:

AFE101

DIVISION/BRANCH

WATER
WE CAB

SAMPLING DATE

6/25/97

LAB ARRIVAL DATE

6/26/97

DUE DATE

7/17/97

DU NUMBER

AFE

DATASET NUMBER

970310

STUDY_1

CSC Ltd

PRIORITY 2

CONTRACTOR

Pre

[illegible]

FINAL RESULTS REPORT
PARAMETER: O & G (Hexane-Extractable Material)

SAMPLE ORGANIZATION:

SAMPLE BATCH ID: 970310

SAMPLE REQUESTOR: PRC

ACCOUNT NO: AFE

FACILITY: CSC LTD

SAMPLE ID: 97KR03 S01

MATRIX: WATER

UNIT: MG/L

RLIMS METHOD: 413.1 NS (EPA 1664)

DATE COLLECTED: 6/25/97

DATE RECEIVED: 6/26/97

DATE EXTRACTED: 7/9/97

DATE ANALYZED: 7/11/97

CAS NUMBER	COMPOUND	AMOUNT	QUALIFIER
	OIL & GREASE	2.75	

ANALYZED BY: Blair Duff *Blair Duff* 7/15/97

TEAM LEADER: *J. Evangelista*

Qualifiers:

U - UNDETECTED

FINAL RESULTS REPORT
PARAMETER: O & G (Hexane-Extractable Material)

SAMPLE ORGANIZATION:

SAMPLE BATCH ID: 970310

SAMPLE REQUESTOR: PRC

ACCOUNT NO: AFE

FACILITY: CSC LTD

SAMPLE ID: 97KR03 S02

MATRIX: WATER

UNIT: MG/L

RLIMS METHOD: 413.1 NS (EPA 1664)

DATE COLLECTED: 6/25/97

DATE RECEIVED: 6/26/97

DATE EXTRACTED: 7/9/97

DATE ANALYZED: 7/11/97

CAS NUMBER	COMPOUND	AMOUNT	QUALIFIER
	OIL & GREASE	5.0	

ANALYZED BY: Blair Duff *Blair Duff* 7/15/97

TEAM LEADER: *J. Frangos*

Qualifiers:

U - UNDETECTED

FINAL RESULTS REPORT
PARAMETER: O & G (Hexane-Extractable Material)

SAMPLE ORGANIZATION:

SAMPLE BATCH ID: 970310

SAMPLE REQUESTOR: PRC

ACCOUNT NO: AFE

FACILITY: CSC LTD

SAMPLE ID: 97KR03 R06

MATRIX: WATER

UNIT: MG/L

RLIMS METHOD: 413.1 NS (EPA 1664)

DATE COLLECTED: 6/25/97

DATE RECEIVED: 6/26/97

DATE EXTRACTED: 7/9/97

DATE ANALYZED: 7/11/97

CAS NUMBER	COMPOUND	AMOUNT	QUALIFIER
	OIL & GREASE	1.2	

ANALYZED BY: Blair Duff *Blair Duff 7/15/97*

TEAM LEADER: *J. Evangelist*

Qualifiers:

U - UNDETECTED

CASE NARRATIVE

DATA SET NO: AFE 970310
SITE NAME: CSC Ltd.
ANALYSIS: OIL & GREASE
Hexane-Extractable Material (HEM) by Method 1664

TO: Dr. Chi Tang, Team Leader, Organic Section
FROM: Blair Duff, Chemist
DATE: July 15, 1997

I. DATA SET DESCRIPTION:

This data set consisted of 3 water samples for oil and grease analysis, or what is now referred to as Hexane-Extracted Material or HEM in EPA method 1664. The extraction was carried out, using separatory funnels. The holding time of 28 days was met. The samples were collected on June 25, 1997 and were received in the laboratory on June 26, 1997.

There were no problems associated with the analysis.

II. INSTRUMENT QUALITY CONTROL:

The analytical balance used for this gravimetric procedure was calibrated prior to all weight measurements. No other instruments were used.

III. METHOD QUALITY CONTROL: The minimum quality assurance requirements for Method 1664 are initial demonstration of laboratory capability, ongoing analyses of standards and blanks, and matrix spike (MS) and matrix spike duplicate (MSD).

1. Method Blank

Reagent water was extracted with hexane and the HEM result was 0.4 mg/L. This is below the CRL interim detection limit of 2.0 mg/L, a value based on previous method blank analysis and the minimum level that has been set for HEM in Method 1664. There was no visible oily residue nor was there any sodium sulfate crystals in the blank.

2. Ongoing Precision & Recovery (Laboratory Spike & Spike Duplicate)

Spike and spike duplicate recoveries are 90.5% and 81.75%, with a RPD% of 10.2%. The spike recovery is acceptable under the criteria in Method 1664 of 79 - 114%.

3. Matrix Spike/Matrix Spike Duplicate

There were no MS/MSD water samples submitted to CRL for this data set. Extra sample volumes will have to be requested for future sampling activities.

IV. SAMPLE RESULTS:

The HEM results for the water sample were in the range of 1.2 - 5.0 mg/L.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY



REGION 5 CENTRAL REGIONAL LABORATORY

536 SOUTH CLARK STREET

CHICAGO, ILLINOIS 60605

Date: OCT 06 1997

Subject: Review of Region 5 Data for CSC Ltd.

From: Charles T. Elly, Director *Chuck Elly*
Region 5 Central Regional Laboratory

To: TETRA TECH

Attached are the results for CSC Ltd.

CRL request number 970310

for analyses for Antimony, Cadmium, Lead and Thallium

Results are reported for sample designations: 97KR03S01, 97KR03S02 and 97KR03R06

Results Status:

- ☒ (x) Acceptable for Use
- ☐ () Data Qualified, but Acceptable for use
- ☐ () Data Unacceptable for Use

Comments on Data Quality by Reviewer

Analytical spike recoveries for the cadmium analysis of samples 97KR03S01 and 97KR03S02 (86.8% and 86.5%) were outside the CRL acceptance limits of $100 \pm 10\%$. The matrix spike recovery for cadmium for the batch was in control (103.7%; CRL limits $100 \pm 15\%$). The results for cadmium (all less than $0.2 \mu\text{g Cd/L}$) were well below the NPDES permit limit of $8.2 \mu\text{g Cd/L}$, leading to the conclusion that there was little cause for reanalysis. The data may be used as is. The lead result for sample 97KR03S02 is above the NPDES permit limit for this facility of $20 \mu\text{g Pb/L}$.

Comments by Laboratory Director or Quality Control Coordinator

Review Record for CSC Ltd.

John V. Man 3 Oct 97
Peer Task Monitor Review and Date (✓) Reviewed () Unreviewed

John V. Man 3 Oct 97
Team Leader and Date (✓) Reviewed () Unreviewed

Chuck E. Elb 10/3/97
QC Coordinator and Date () Reviewed (✓) Unreviewed
(position vacant)

Sylvia Griffin OCT 06 1997
Data Management Coordinator and Date Received

Date Transmitted OCT 06 1997

Please sign and date this form below and return it with any comments to:

Sylvia Griffin
Data Management Coordinator
Region 5 Central Regional Laboratory
ML - 10C

Received by and Date

Comments:

Site Name: CSC Ltd.
Date Generated: October 2, 1997

Method Number: AA METALS
Data Set #: 970310

GFAA NARRATIVE for Data Set 970310

Three water samples (97KR03S01, S02 and R06) were submitted for the analysis of total cadmium, lead, antimony and thallium by GFAA. The samples were collected on 06.25.97 and were received by the CRL properly preserved on 06.26.97.

The samples were digested following standard CRL GFAA digestion protocols for waters on 09.10.97. The samples were analyzed on 09.12.97 through 09.30.97 within the six month hold time for metals.

Analytical results were stored in .DAT files CDMK0918.DAT, PBMK0912.DAT, SBMK0930.DAT and TLMK0918.DAT..

Cadmium

Data File CDMK0918.DAT

The analytical spikes performed on samples 97KR03S01 (86.8%) and 97KR03S02 (86.5%) were outside of the control limits of 90-110% as specified in the SOP. This was discussed with Dr. John Morris and was determined to be caused by an unknown negative interference. The magnitude of the negative interference was not considered to be significant enough to affect the integrity of the data, especially in light of the permit limit of 8.2 $\mu\text{g Cd/L}$.

All remaining QC were within the specified control limits of the SOP.

All cadmium data are acceptable.

Lead

Data File PBMK0912.DAT

All QC were within the specified control limits of the SOP.

All lead data are acceptable.

Narrative by: M. Kupper Chemist, USEPA
Date: 10.2.97

FINAL SAMPLE REPORT FOR GFAA

DATA SET 970310

CSC Ltd.

(μ g/L)

SAMPLE 97KR03	Cd RESULT	Pb RESULT	Sb RESULT	Tl RESULT
S01	0.2 U	2 U	2 U	2 U
S02	0.2 U	29	4	2 U
R06	0.2 U	2 U	2 U	2 U
ANALYST/ DATE	<i>M. Kupp</i> 10.2.97	<i>M. Kupp</i> 10.2.97	<i>M. Kupp</i> 10.2.97	<i>M. Kupp</i> 10.2.97

mm
30.4.97

Antimony

Data File SBMK0930.DAT

All QC were within the specified control limits of the SOP.

All antimony data are acceptable.

Thallium

Data File TLMK0918.DAT

All QC were within the specified control limits of the SOP.

All thallium data are acceptable.

Narrative by: M. K. Papp Chemist, USEPA
Date: 10.2.97

ATTACHMENT 4

CWA-SPCC INSPECTION REPORT

(3 Sheets)

(0.3.5.2)

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

SE-5J/OPRS-SPCC
W36904

Mr. Joseph R. Ford
Manager - Safety & Security
CSC, Ltd.
4000 Mahoning Avenue
Warren, Ohio 44483-1968

Dear Mr. Ford:

An inspection of your facility on June 24, 1997, indicated that your Spill Prevention, Control and Countermeasures ("SPCC") Plan does not address the requirements of Part 112 of Title 40 of the Code of Federal Regulations ("40 C.F.R. Part 112"). The deficiencies of your facility's Plan are listed in the attachments to this letter.

Also, under 40 C.F.R. Section 112.20(e), 59 Federal Register 34070, 34098-34101 (July 1, 1994), the owner/operator of a facility must determine pursuant to 112.20(a)(2) whether the facility could, because of its location, reasonably be expected to cause substantial harm to the environment by discharging oil into or on the navigable waters or adjoining shorelines of the United States. Those facilities which could reasonably be expected to cause substantial harm must submit a Facility Response Plan in accordance with 40 C.F.R. § 112.20(a). Facilities which could reasonably be expected to cause significant and substantial harm must submit a Facility Response Plan in accordance with 40 C.F.R. § 112.20(a) and have it approved by the U.S. EPA. Those facilities which could not reasonably be expected to cause substantial harm shall complete and maintain at the facility the certification form contained in Part 112 Attachment C-II--Certification of the Applicability of the Substantial Harm Criteria. Attachment C-II has been enclosed with this letter to assist you in this self-determination process.

Pursuant to Section 311(b) of the Clean Water Act, as amended by the Oil Pollution Act of 1990, 33 U.S.C. § 1321(b), violations of the SPCC regulations, contained at 40 C.F.R. Part 112, subject owners and operators of a facility to administrative civil penalties of up to \$10,000 per day (up to a maximum of \$125,000) or judicial civil penalties of up to \$25,000 per day.

CSC, Ltd. should promptly take action to correct the violations and come into compliance with the SPCC regulations, if it has not already done so. To determine your present status of compliance with the SPCC regulations, U.S. EPA requests, pursuant to Sections 311(m) and 308(a) of the Clean Water Act, 33 U.S.C. §§ 1321(m) and 1318(a), that you provide the documents which can be found in Attachment B (which specifies information which the facility must submit for each violation) and a completed copy of Attachment C-II within thirty (30) calendar days from the date of receipt of this letter.

These materials should be sent to:

U.S. Environmental Protection Agency
Region 5, Superfund Division
Emergency and Enforcement Response Branch
Oil Planning & Response Section (SE-5J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590
Attn: Dr. Barbara A. Carr, SPCC Coordinator

All materials submitted must be accompanied by a certification that all materials and all statements submitted by your facility are true and accurate to the best of the signatory's knowledge and belief. This certification must be notarized and signed by an authorized official of your facility. The SPCC plan and all subsequent amendments must be reviewed and certified by a registered Professional Engineer who is familiar with the facility and with 40 C.F.R. Part 112. The engineer's name, registration number, State of registration, date of certification and seal must be included as part of the Plan.

This Request for Information is not subject to the approval requirements of the Paperwork Reduction Act of 1980, 44 U.S.C. Part 35. The U.S. EPA has the authority to use the information requested herein in an administrative, civil or criminal action.

In addition, enclosed for your information is a sample form which can be attached to your SPCC Plan to document that the required three year review has been completed. Finally, we have also enclosed a poster which identifies the State, regional and national emergency phone numbers which may be used on a 24-hour 7-day/week basis to report spills. Feel free to reproduce this poster.

If U.S. EPA does not receive an adequate response from your facility, it will be required to review its enforcement options. If you have any questions, please feel free to contact Dr. Carr of my staff at (312) 886-7187.

Sincerely,

GEORGE OPEK
Gofek

Beverly J. Kush, Chief
Oil Planning & Response Section

Attachments (Attachment A & B, Three-year annual review form, C-II form, poster)

cc: Ohio Environmental Protection Agency

bcc: yellow (official case file)
blue (SPCC read)

SPCC1 - Noncompliance/IFisher/6-7597/07-15-97/CSC.sp1

ATTACHMENT A

VIOLATIONS OF THE SPCC REGULATIONS FOUND DURING INSPECTION

The following violations of 40 C.F.R. 112 (the SPCC regulations) were discovered when your facility was inspected for compliance:

- ☐ Failure to Implement SPCC Plan (40 C.F.R. § 112.3(a)).
- ☐ Failure to Have Plan Certified by a Registered Professional Engineer (40 C.F.R. § 112.3(d))
- ☐ Failure to Make SPCC Plan Available During Inspection (40 C.F.R. § 112.3(e))
- ☐ Failure to Maintain SPCC Plan at the Facility (40 C.F.R. § 112.3(e))
- ☒ Failure to Amend SPCC Plan (40 C.F.R. § 112.5).
- ☒ Failure to Review SPCC Plan at least Every Three Years (40 C.F.R. § 112.5(b))
- ☒ Inadequate SPCC Plan (40 C.F.R. § 112.7).

ATTACHMENT B

SPECIFIC INFORMATION WHICH FACILITY MUST SUBMIT FOR EACH VIOLATION IDENTIFIED IN ATTACHMENT A

- **For Failure to Amend SPCC Plan:** An amended SPCC Plan, certified by a Registered Professional Engineer, approved by management at a level with authority to commit the necessary resources, and photographic evidence that your SPCC Plan has been fully implemented along with a statement from an authorized representative of your facility identifying and authenticating the photographs and certifying the date on which the facility amended and fully implemented its SPCC Plan. If your facility is unable to provide an adequate SPCC Plan within the required time period, then your facility should submit, within thirty days of receipt of this letter, a detailed schedule which indicates when the facility's SPCC Plan will be complete and when implementation will occur. Within the timeframe set forth in that schedule, your facility will then submit the above-requested information.
- **For Failure to Review SPCC Plan at Least Every Three Years:** An SPCC Plan which indicates the date on which a review of the Plan was conducted, along with the signature and title of an authorized official of the facility, if an amendment to the SPCC Plan is unnecessary. An amendment is necessary whenever there is a change in facility design, construction, operation or maintenance which materially affects the facility's potential for the discharge of oil into or upon the navigable waters of the United States or adjoining shore lines. If an amendment to the SPCC Plan is necessary, the required changes must be made, certified by a Professional Engineer and the amended SPCC Plan must be submitted along with the date of review, and the signature and title of an authorized official of the facility.
- **For Inadequate SPCC Plan:** An adequate SPCC Plan, certified by a Registered Professional Engineer, approved by management at a level with authority to commit the necessary resources, and photographic evidence that your SPCC Plan has been fully implemented along with a statement from an authorized representative of your facility identifying and authenticating the photographs and certifying the date on which the facility fully implemented its SPCC Plan. If your facility is unable to provide an adequate SPCC Plan within the required time period, then your facility should submit, within thirty days of receipt of this letter, a detailed schedule which indicates when the facility's SPCC Plan will be complete and when implementation will occur. Within the timeframe set forth in that schedule, your facility will then submit the above-requested information. Please respond to/address the specific deficiencies listed below:

40 CFR 112.7 - Guidelines for the preparation and implementation of a Spill Prevention Control and Countermeasure Plan

Failure to provide full approval of management at a level with authority to commit the necessary resources.

Failure to provide complete discussion and implementation schedule of items to be installed.

Failure to follow the sequence of §112.7.

- (b) Failure to predict the direction, rate of flow, and total quantity of oil which could be discharged from the facility as a result of each major type of equipment failure. (Not stated in Plan)
- (d) (2) Failure to provide a written commitment of manpower, equipment and materials required to handle any quantity of oil discharged.
- (e) (1) Failure to provide complete discussion and/or implement requirements pertaining to Facility Drainage. Please provide a drainage diagram and pin point the storage tanks location.
- (e) (2) Failure to provide complete discussions and/or implement requirements pertaining to Bulk Storage Tanks
- (vi) Failure to test aboveground tanks by hydrostatic testing, or visual inspection or shell thickness testing (with comparison records maintained); (Not stated in Plan)

Failure to inspect all bulk storage tanks periodically. (Not stated in Plan)

- (ix) Failure to observe disposal facility systems which discharge into navigable waters on a frequent basis. (Not stated in Plan)
- (e) (3) Failure to provide complete discussions and/or implement requirements pertaining to Facility Transfer Operations.
- (iv) Failure to regularly assess all aboveground valves and pipelines by operating personnel. (Not stated in Plan)

Failure to conduct periodic pressure testing for piping in areas where facility drainage is such that a failure may lead to a spill event. (Not stated in Plan)

- (v) Failure to warn large vehicles verbally or by appropriate signs to be cautious of aboveground piping. (Not stated in Plan)
- (e) (4) Failure to provide complete discussions and/or implement requirements pertaining to Facility Tank Truck Loading/Unloading Rack.
- (i) Failure to meet the minimum requirements and regulation established by the Department of Transportation regarding tank car and tank truck loading and unloading procedures. (Not stated in Plan)
- (iv) Failure to inspect drains and outlet. on tank cars and tank trucks are inspected for leakage prior to filling and departure. (Not stated in Plan)
- (e) (10) Personnel, training and spill prevention procedures.

- (ii) Failure to designate a person accountable for oil spill prevention who reports to line management within the SPCC Plan. *(Not stated in Plan)*
- (iii) Failure to schedule and conduct spill prevention briefings of the SPCC Plan for operating personnel on a regularly scheduled basis. *(Not stated in Plan) Please provide copies of spill prevention briefings records.*

ATTACHMENT 5

**RCRA AND OAC - HAZARDOUS WASTE
INSPECTION REPORT**

(60 Sheets)

**RCRA HAZARDOUS WASTE FACILITY
COMPLIANCE EVALUATION INSPECTION CHECKLIST**

(Multimedia)

Facility: ① CSC, LTD. (Previously known as: Copperweld Steel Co.)

USEPA I.D.: ② OHR000007773 ③ Old ID # OHD 061731857

Street: 4000 Mahoning Ave

City: Warren State: OH zip: 44483-1968

County: Trumbull Telephone: 330-841-6789

Fax No: 330-841-6657

PUCO No.: _____

Owner/Operator: Reserve Company, Dayton, OH

① Street: CSC came into being on Oct 12, 1995. Copperweld

City: does not exist anymore State: _____ Zip: _____

② Telephone: New ID No. ③ Copperweld Steel I.D. #

Inspection Date: 6/24/97 Time: 8:30 AM

Advance notice of inspection given? (yes) _____ (no) X
If so, how far in advance? _____

	<u>Name</u>	<u>Agency/Title</u>	<u>Phone</u>
Inspectors:	Mark Moloney	USEPA	216-835-5200
	Sirtaj Ahmed	USEPA	312-886-4445
	Ed Wojciechowski	" (Air)	312-
	Jeff Bratko	" (EMS)	312-
	George Opek	" (SPCC)	312-

Facility Representative: Jack A. Vankirk CSC Mgr Env. 330-841-6789
Joseph R. Ford CSC Mgr Safety 330-841-6557

Additional names on attached sheet.

STATUS

Cond. Ex. SQG _____ SQG _____ Large Quantity Generator X
Treatment _____ Storage _____ Disposal _____ Transporter _____

Part A Permit: (yes) X (no) _____ Part B Permit: (yes) _____ (no) X
IDR Checklist Attached: (yes) X (no) _____
with all manifests

ACTIVITIES

Containers _____	Used oil burner _____
Tanks _____	Hazardous waste fuel burner/blender _____
Wastepile <u>NO</u>	Incineration/Thermal treatment _____
Landfill <u>Used to - No more own.</u>	Land treatment _____
Surface Impoundment <u>X</u> A, B & C	Groundwater monitoring <u>No More. Previously</u>
Lagoons	<u>used to w/ Landfills.</u>

REMARKS - GENERAL INFORMATION

Include list of wastes being generated/managed at the site and a brief description of site activity and waste handling procedures:

- Baghouse Dust (K061): Dust generated from Steel production Facility poured into trucks directly, or to recycling silo and mixed with by-product (Mill Scales).
- * - Safety Kleen Partswashers (D001, D018, D039)
- Acid (H_2SO_4) K062

- * At this time, recycle on-site 15% of the Mill Scales. The remaining is sent outside to Horsehead Company for recovery of lead, Zinc and Cadmium.

- 2 - Landfills - Eastern/EAF - both are complete - The company (CSC) no longer owns them. Both Landfills approved closure Both Seeded (EAF) on 10/13/93
- The Landfills do not belong to CSC. The Closure funds along with Landfills handed over to OEPA.

5

GENERATOR CLASSIFICATION (OAC 3745-52-34)

Does the facility:

1. Generate < 100 Kg (25-30 gallons) of hazardous waste in a calendar month?

(yes) _____ (no) X

If so, the facility is classified as a Conditionally Exempt Small Quantity Generator, unless 3.b. applies. Please complete the Conditionally Exempt Small Quantity Generator Requirements checklist.

2. Generate between 100 and 1000 Kg of hazardous waste in a calendar month? (about 25 to under 300 gallons)

(yes) _____ (no) X

If so, the facility is classified as a Small Quantity Generator, unless 3.b. applies. Please stop here and complete the Small Quantity Generator Requirements checklist.

3. a. Generate > 1000 Kg (- 300 gallons) of hazardous waste in a calendar month?

(yes) X (no) _____

or;

- b. Generate > 1 Kg of acutely hazardous waste in a calendar month?

(yes) _____ (no) X

If so, the facility is classified as a Large Quantity Generator. Please complete the Large Quantity Generator Requirements checklist.

REMARKS - GENERATOR CLASSIFICATION

- Baghouse dust
- Safety Klean Part washers - 30 gal
- Waste Sulphuric Acid

4

OAC 3745-52 - LARGE QUANTITY GENERATOR REQUIREMENTS

WASTE EVALUATION (OAC 3745-52-11)

Y/N/NA RMK #

1. Have wastes generated at the facility been evaluated in compliance with the waste evaluation requirements of OAC rule 3745-52-11(A) (B) and (C)?
- evaluated & analyzed*
- (a) Has the generator's evaluation identified in Question #1 included an evaluation for the (TC) Toxicity Characteristics identified in 3745-51-24? [3745-52-11(C)]

Y _____

Y _____

NOTE: The TC rule requirement noted above must include an evaluation of the metal as well as organic TC constituents identified in 3745-51-24.

If not, specify those waste streams which the generator has failed to adequately evaluate:

2. Are any wastes generated at the facility identified by the generator as being excluded from regulation under Rule 3745-51-04? *Previously, neutralized pickle waste was exempt. Currently not exempt.*
- If so, specify those waste streams identified by the generator as being excluded under 3745-51-04:

Y _____

Recycling baghouse dust, (pickle liquor K062 - Deleted - no more)

3. Is the facility generating any wastes which are identified as recyclable materials as defined in OAC 3745-51-06(A)?

Y _____

If so, please identify these waste streams below:

Baghouse Dust

Y/N/NA RMK #

4. In accordance with OAC rule 3745-51-02(E), is the generator recycling any materials on-site by:

a. Using or reusing the material as an ingredient in an industrial process to make a product?

N

i. If so, is the material being reclaimed before it is used or reused?

N

b. Using the material as a substitute for commercial products? (*Substitute for Scrap - Baghouse dust*)

Y

recycle

c. Returning the material to the original process from which it was generated as a substitute for a raw material feedstock?

N

i. If so, is the material reclaimed before returning to the original process?

N

NOTE: The materials identified in Question #4 may not be considered wastes if recycled as described above, unless the conditions identified in Questions 4(a)(i) or 4(c)(i) are true. See O.A.C. Rule 3745-51-02(E).

Please identify those materials that the generator is recycling as described in 4.a., 4.b. and/or 4.c. below:

Baghouse dust

5. Has the generator identified any waste treatment activity as being excluded from regulation because of totally enclosed treatment or via operation of an elementary neutralization unit and/or wastewater treatment unit as described in Rule 3745-65-01?

N

If so, specify those waste treatment activities which the generator has identified as being excluded from regulation:

Pickle liquor

GENERATOR IDENTIFICATION NUMBER (OAC 3745-52-12)

6. Prior to treating, storing, disposing, transporting or offering to transport hazardous waste, has the generator obtained a generator identification number from US EPA or Ohio EPA as required by 3745-52-12?

Y

GENERATOR ANNUAL REPORT (OAC 3745-52-41)

7. Has the generator filed annual reports to the Director on or before March 1st of each calendar year as required by 3745-52-41?

Y

HAZARDOUS WASTE IMPORT/EXPORT (OAC 3745-52-50 TO 3745-52-57
AND OAC 3745-52-60)

Y/N/NA RMK #

8. Does the generator import or export hazardous waste?

N _____

If so, are the wastes handled in accordance with the
requirements of 3745-52-50 through 3745-52-57 and
3745-52-60?

N/A _____

REMARKS - HAZARDOUS WASTE IMPORT/EXPORT

PRE-TRANSPORT REQUIREMENTS (OAC 3745-52-30 TO 3745-52-33)

9. Does the generator meet the following pre-transport
requirements prior to offering hazardous wastes for
transport off-site:

a. The waste material is packaged, labeled, and marked
in accordance with the applicable DOT regulations
[3745-52-30, 3745-52-31, and 3745-52-32(A)]?

Y _____

b. Each container with a capacity of 110 gallons or less
is affixed with a completed hazardous waste label as
required by 3745-52-32(B)? (*No container*)

N/A _____

c. Before transporting hazardous wastes off-site or
offering hazardous wastes for transportation off-
site, does the generator placard or offer the
appropriate DOT placards to the initial transporter
in compliance with 3745-52-33?

Y _____

REMARKS - PRETRANSPORT REQUIREMENTS

*Baghouse dust straight into
trucks,
and also
the Waste Acids (H₂SO₄)*

GENERATOR ACCUMULATION IN CONTAINERS AND TANKS
(OAC 3745-52-34)

Y/N/NA RMK #

1. If the generator elects to accumulate hazardous waste on-site in containers or tanks for 90 days or less without a permit as provided under 3745-52-34, are the following requirements met: *Do not accumulate.*

Truck directly from Baghouse or pickling process tanks to outside.

- a. The containers or tanks are clearly marked with the words "Hazardous Waste?" [3745-52-34(A)(3)]
- b. The date that accumulation began is clearly marked on each container? [3745-52-34(A)(2)]

In addition, OAC 3745-52-34(A)(1) also requires generators accumulating hazardous waste(s) in containers < 90 days to comply with the "Container Management" Rules of OAC 3745-66-70 to 3745-66-77. If the generator is accumulating hazardous waste(s) in containers, please complete Management of Containers checklist to document compliance with these requirements.

2. Is the generator accumulating hazardous waste(s) in tanks?

If so, OAC 3745-52-34(A)(1) requires generators to comply with rules 3745-66-90 to 3745-66-992 except paragraph (C) of rule 3745-66-97 and rule 3745-66-991.

If the generator is accumulating hazardous waste(s) in tanks, complete the Tank System Requirements checklist to document compliance with these requirements.

3. Has the generator accumulated hazardous wastes in excess of ninety (90) days?

- a. If so, has the generator been granted an extension by the Director for accumulation in excess of (90) days?

REMARKS - GENERATOR ACCUMULATION REQUIREMENTS

* Material/Waste placed straight into trucks or into recycle loop.

- N/A

* See previous page

PREPAREDNESS AND PREVENTION (OAC 3745-65-30 TO 3745-65-37)

Y/N/NA RMK #

1. Is the facility operated to minimize the possibility of fire, explosion, or non-planned release of hazardous waste? [3745-65-31]

Y _____

2. Has there been a fire, explosion or non-planned release of waste at the facility since date of last inspection?

N _____

a. If yes, was the contingency plan implemented? [3745-65-51(B)]

N/A _____

NOTE: Small quantity generators are not required to maintain a contingency plan. Question #2(a) is, therefore, not applicable to SQGs.

3. If required due to actual hazards associated with the waste, does the facility have the following equipment: [3745-65-32(A) (B) (C) (D)]

a. Internal alarm system?

Y _____

b. Access to telephone, radio or other device for summoning emergency assistance?

Y 2-way radios

Emergency Plan Shows everything

c. Portable fire control equipment, spill control and decontamination equipment?

Y _____

d. Water of adequate volume and pressure via hoses, sprinkler, foamers or sprayers?

Y _____

4. Is all required spill control and decontamination equipment, fire and communications equipment tested on a weekly basis and maintained as necessary? [3745-65-33]

Y _____

a. Does the facility keep an equipment testing log required by 3745-65-33(B), including date and time of test, name of person conducting the test, observations made, and date and nature of any repairs?

Y _____

5. If required due to the actual hazards associated with the waste, do personnel have immediate access to an emergency communication device during times when hazardous waste is being physically handled? [3745-65-34]

Y _____

6. If required due to the actual hazards associated with the waste, is adequate aisle space maintained to allow unobstructed movement of emergency or spill control equipment? [3745-65-35]

X _____

Y/N/NA RMK #

7. If required due to the actual hazards associated with the waste, has the facility attempted to make appropriate arrangements with local authorities to familiarize them with possible hazards and facility layout? [3745-65-37(A)]

(Champion & Warren fire Depts)

8. Where state and local emergency service authorities have declined to enter into any proposed special arrangements or agreements, has the refusal been documented? [3745-65-37(B)]

REMARKS - CONTINGENCY PLAN/PREPAREDNESS AND PREVENTION REQUIREMENTS

PERSONNEL TRAINING (OAC 3745-65-16)

Y/N/NA RMK #

1. Does the generator provide a personnel training program in compliance with 3745-65-16(A) (B) (C) including instruction in safe equipment operation and emergency procedures, and implementation of the contingency plan? [3745-52-34(A) (4)]
(Computer tracking system in place)
2. Does the generator provide personnel training to new employees within 6 months after the date of employment as required by 3745-65-16(B)? [3745-52-34(A) (4)]
3. Does the generator provide an annual refresher training course as required by 3745-65-16(B)? [3745-52-34(A) (4)]
4. Does the generator keep all the records required by 3745-65-16(D) (E) including; written job titles, job descriptions and documented employee training records? [3745-52-34(A) (4)]

Y _____
Y _____
Y _____
Y _____

REMARKS - PERSONNEL TRAINING REQUIREMENTS

12
CONTINGENCY PLAN (OAC 3745-65-50 THROUGH 3745-65-56)

Y/N/NA RMK #

1. Does the o/o have a written contingency plan designed to minimize hazards from fire, explosions or unplanned releases of hazardous wastes which contains the following components: [3745-65-52 (A) (B) (C) (D) (E)]
 - a. Actions to be taken by personnel in the event of an emergency? Y _____
 - b. Arrangements or agreements with local or state emergency authorities? Y _____
 - c. Names, addresses and telephone numbers of all persons qualified to act as emergency coordinator? Y _____
 - d. A list of all emergency equipment including location, physical description and outline of capabilities? Y _____
 - e. If required due to the actual hazards associated with the waste handled, an evacuation plan for facility personnel? [3745-65-52 (F)]? Y _____
2. Is the contingency plan designed to minimize hazards to human health or the environment from fires, explosions or any unplanned release of hazardous waste or hazardous waste constituents to air, soil or surface water? [3745-65-51 (A)] Y _____
3. Is a copy of the contingency plan and any plan revisions maintained on-site and has the plan been submitted to all local and state emergency authorities that might be required to participate in execution of the plan? [3745-65-53 (A) (B)] Y _____
4. Is the plan revised in response to rule changes, facility, equipment and personnel changes or failure of the plan? [3745-65-54] Y _____
5. Is an emergency coordinator who is familiar with all aspects of site operation and emergency procedures who has the authority to implement all aspects of the contingency plan designated at all times (on-site or on-call)? [3745-65-55] Y _____
6. If an emergency situation has occurred, has the emergency coordinator implemented all or part of the contingency plan and taken all of the actions and made all of the notifications necessary under 3745-65-56 (A-J)? N/A _____

(Not had any)

SATELLITE ACCUMULATION AREA REQUIREMENTS
(OAC 3745-52-34(C))

Y/N/NA RMK #

1. Has the facility elected to accumulate hazardous waste at or near a point of generation which is under the control of the operator of the process generating the waste? (defined as satellite accumulation)

Don't accumulate hz W @ any Satellite Storage Places

If so, are the following requirements of OAC 3745-52-34(C) being met:

- a. Quantities of waste accumulated do not exceed 55 gallons at any time?
- b. Quantities of acutely hazardous waste accumulated do not exceed 1 quart at any one time?
- c. The generator has marked the containers with words "Hazardous Waste" or with other words identifying the contents of the container?

N/A
Waste directly to trucks & Partwashed only

If the facility is maintaining satellite accumulation areas as identified in 1.a. and 1.b. above, OAC 3745-52-34(C) also requires that the container(s) in these areas be managed in compliance with the "Container Management" requirements of OAC 3745-66-71, 3745-66-72, 3745-66-73(A), 3745-66-76 and 3745-66-77. Please complete the Use and Management of Containers checklist to document compliance with these requirements.

2. Is the facility accumulating hazardous waste(s) in excess of the amounts listed in either 1.a or 1.b?
- a. If so, did the generator comply with 3745-52-34(A) within three (3) days? and;
 - b. Upon accumulating > 55-gallons of waste, did the generator mark the container holding the excess hazardous waste with the date the excess began accumulating?

REMARKS - SATELLITE ACCUMULATION REQUIREMENTS

14

CONDITIONALLY EXEMPT SMALL QUANTITY GENERATOR REQUIREMENTS

WASTE EVALUATION (OAC 3745-52-11)

Y/N/NA RMK #

1. Have the wastes generated at this facility been evaluated as required under 3745-52-11(A) (B) and (C)?

(A) Has the generator's evaluation identified in Question #1 included an evaluation for the (TC) Toxicity Characteristics identified in 3745-51-24? [3745-52-11(C)]

NOTE: The TC Rule requirement noted above must include an evaluation of the metal as well as organic TC constituents identified in 3745-51-24.

If not, specify the waste(s) that the generator has failed to provide an adequate evaluation of:

GENERATOR CLASSIFICATION

2. Does the generator produce <100 kg of hazardous waste per month? (conditionally exempt SQG)
3. Does the conditionally exempt SQG generate acutely hazardous waste in quantities exceeding those specified in 3745-51-05(E) or 3745-51-05(F)? If so, complete the Large Quantity Generator Requirements checklist.
4. Do quantities of hazardous waste accumulated on-site at any one time exceed 1000 kg - or does the generator produce between 100 and 1000 kg of hazardous waste per month - (SQG)? If so, complete the Small Quantity Generator Requirements inspection checklist.

OFF-SITE SHIPMENT OF HAZARDOUS WASTE

5. Does the conditionally exempt SQG ensure delivery of hazardous waste(s) to an off-site permitted TSD?

REMARKS - CESQG REQUIREMENTS

SMALL QUANTITY GENERATOR (SOG) REQUIREMENTS

WASTE EVALUATION (OAC 3745-52-11)

Y/N/NA RMK 卷

1. Have the wastes generated at the facility been evaluated as required under 3745-52-11?

(a) Has the generator's evaluation identified in Question #1 included an evaluation for the (TC) Toxicity Characteristics identified in 3745-51-24?
[3745-52-11(C)]

NOTE: The TC Rule requirement noted above must include an evaluation of the metal as well as organic TC constituents identified in 3745-51-24.

If not, please specify those waste(s) which the SQG has failed to provide an adequate evaluation of:

GENERATOR CLASSIFICATION

2. Do quantities of hazardous waste accumulated on-site exceed 6000 kgs? (If so, TSD standards apply. Complete applicable TSD checklists.) [3745-52-34(D) and (F)]

GENERATOR IDENTIFICATION NUMBER (QAC 3745-52-12)

3. Has the generator obtained an identification number from either U.S. EPA or Ohio EPA as required under 3745-52-12 prior to treating, storing, disposing, transporting or offering hazardous waste for transport?

MANIFEST REQUIREMENTS (OAC 3745-52-20 TO 3745-52-23)

4. Are waste streams generated at the facility being reclaimed under a contractual agreement as defined in OAC 3745-52-20(F)?

If not, the generator is subject to manifest requirements of OAC 3745-52-20 through 3745-52-23. Please complete the Manifest Requirements checklist to document compliance with these requirements.

16
SOG - EMERGENCY PROCEDURES/PREPAREDNESS AND PREVENTION
(OAC 3745-65-30 TO 3745-65-37)

Y/N/NA RMK #

5. Is an emergency coordinator available at all times?
[3745-52-34 (D) (5) (a)]
Joe or Jack available. 24 hrs/7 days /wk
6. Has the following information been posted by the telephone? [3745-52-34 (D) (5) (b)]:
- a. Name and telephone number of emergency coordinator?
- b. Location of fire and spill control equipment?
- c. Telephone number of local fire department?
7. Have emergencies been reported to the National Response Center? [3745-52-34 (D) (5) (d)]
8. Are all employees thoroughly familiar with proper handling and emergency procedures? [3745-52-34 (D) (5) (c)]
90% are

Y
Y
Y
None
Y

In addition to the above, the small quantity generator must comply with the "Preparedness and Prevention" requirements of OAC 3745-65-30 through 3745-65-37. Please complete the Preparedness and Prevention checklist to document compliance with these requirements.

SOG - ACCUMULATION OF HAZARDOUS WASTES (OAC 3745-52-34)

9. Is the generator accumulating hazardous wastes in containers? If so,
- a. Is the date accumulation began clearly marked on each container [3745-52-34 (A) (2)]?
- b. Is each container clearly marked with the words "Hazardous Waste" [3745-52-34 (A) (3)]?

N/A

In addition to the above, if the generator is accumulating hazardous waste in containers, please complete the Management of Containers checklist. If the Small Quantity Generator is operating a satellite accumulation area, the Satellite Accumulation Area Requirements portion of the checklist must also be completed.

10. Is the generator accumulating hazardous wastes in tanks?
- a. If so, is each tank clearly marked with the words "Hazardous Waste" [3745-52-34 (A) (3)]?

In addition to the above, if the generator is accumulating hazardous waste(s) in tanks, please complete the Accumulation in Tanks for SOG's checklist.

Y/N/NA RMK #

11. Has the generator accumulated hazardous wastes in excess of 180 days (or 270 days if the waste must be transported more than 200 miles)? [3745-52-34(E)]

a. If so, has the generator been granted an extension by the Director for accumulation in excess of 180 (or 270) days?

N/A

REMARKS - SMALL QUANTITY GENERATOR REQUIREMENTS

18

ACCUMULATION IN TANKS FOR SMALL QUANTITY GENERATORS
(BETWEEN 100 AND 1000 KG/MO)

Applicability: All of the items on this checklist apply to small quantity generators who accumulate hazardous waste in tanks for less than 180 days (or 270 days if hazardous waste must be shipped greater than 200 miles) and do not accumulate over six thousand kg on-site at any time.

TANK SYSTEM OPERATING REQUIREMENTS (OAC 3745-66-992(B))

Y/N/NA RMK #

1. Does the small quantity generator comply with the following operating requirements of OAC 3745-66-992(B):
 - a. Does the treatment or storage of hazardous waste in the tank comply with 3745-65-17(B)?
 - b. Does the generator ensure that wastes or treatment reagents are not placed in a tank if they could cause the tank or its inner liner to rupture, leak, corrode or fail before its intended life?
 - c. Are uncovered tanks operated with 2 feet of freeboard?
 - i. If not, is the tank equipped with a containment structure, drainage control system, or diversion structure with a capacity that equals or exceeds the volume of the top 2 feet of the tank?
 - d. If waste is continuously added, is the tank equipped with a waste feed cut-off or bypass system?

NA	

TANK SYSTEM INSPECTIONS (OAC 3745-66-992(C))

2. Is the generator inspecting the following components of the tank system: [3745-66-992(C)]
 - a. Discharge control equipment (daily)?
 - b. The data from monitoring equipment (daily)?
 - c. The level of the waste in the tank (daily)?
 - d. The construction material (weekly)?
 - e. The area surrounding the tank (weekly)?

SGG - TANK SYSTEM CLOSURE REQUIREMENTS
(OAC 3745-66-992(D))

Y/N/NA RMK #

3. Has the small quantity generator, upon closure of the tank, removed all hazardous waste from the tank system in compliance with OAC 3745-66-992(D)?

N/A

SPECIAL REQUIREMENTS - IGNITABLE AND INCOMPATIBLE WASTES (OAC 3745-66-992(E))

4. Has the SGG complied with either of the two following requirements of OAC 3745-66-992(E):

a. Are ignitable or reactive wastes treated before or immediately after placement in the tank to render either non-reactive or not ignitable?

i. Has this treatment activity been conducted in compliance with 3745-65-17(B)?

OR;

b. Are ignitable and/or reactive wastes stored or treated in a manner which protects the waste from conditions that may cause ignition or reaction?

NOTE: In accordance with Ohio's hazardous waste rules, generators (including small quantity generators) cannot treat hazardous wastes in containers or tanks without obtaining a permit.

5. Is the generator complying with the N.F.P.A.C.L. CODE (1977 or 1981) buffer zone requirements?

6. Are incompatible wastes placed in the same tank?

a. If so, has the SGG complied with OAC 3745-65-17(B)? [3745-66-992(F)]

7. Are incompatible wastes placed in an unwashed tank?

a. If so, has the SGG complied with OAC 3745-65-17(B)? [3745-66-992(F)]

REMARKS - SGG TANK SYSTEM ACCUMULATION REQUIREMENTS

OAC CHAPTER 3745-59 - LDR GENERAL REQUIREMENTS

CASE-BY-CASE EXTENSIONS

Y/N/NA RMK#

1. Has the entity received an extension for compliance with land disposal restrictions from US EPA pursuant to 40 CFR 268.5? If yes,

N/A

Comply w/ all LDR Forms for all outside.

- (a) List the waste(s) affected:

*EAF
Waste Brds
Solvent Cleaners*

- (b) Has the extension been recognized by the Director of Ohio EPA? [O.A.C. Rule 3745-59-05(C)]

N/A

- (c) When does the extension expire?

N/A

NOTE: A case-by-case extension can be granted for up to one year. The extension is renewable once (by US EPA) for an additional year. Until receiving approval of the extension by US EPA and recognition of the extension by the Director of Ohio EPA, the entity must continue to manage the waste in accordance with all applicable LDR requirements.

VARIANCE FROM A TREATMENT STANDARD

2. Has the entity been granted a variance from a treatment standard by US EPA pursuant to 40 CFR 268.44? If yes,

N/A

- No Variances*
(a) List the waste(s) affected:

- (b) Has the variance been recognized by the Director of Ohio EPA? [O.A.C. Rule 3745-59-44(C)]

NOTE: Until the variance has been approved by US EPA and recognized by the Director of Ohio EPA, the entity must continue to manage the waste in compliance with the LDR requirements.

✓

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NO MIGRATION PETITION

Y/N/NA RMK#

3. Has the entity received a variance from US EPA to allow for continued land disposal of untreated LDR wastes based upon a demonstration that there will be no migration from the disposal unit pursuant to 40 CFR 268.6? If yes,

N/A

(a) List the waste(s) affected:

- (b) Has the entity's "no migration" demonstration been recognized by the Director of Ohio EPA? [O.A.C. Rule 3745-59-06(C)]

NOTE: Until the no migration petition has been approved by US EPA and recognized by the Director of Ohio EPA, the entity must continue to manage the waste in compliance with the LDR requirements.

PROHIBITION AGAINST DILUTION

4. Does the entity dilute a restricted waste or a treatment residue from a restricted waste: [O.A.C. Rule 3745-59-03; 40 CFR 268.3]

- (a) As a substitute for adequate treatment to achieve compliance with LDR treatment standards?
- (b) To circumvent the effective date of a prohibition (e.g. to dilute a "non-wastewater" waste to a "wastewater" to avoid complying with the "non-wastewater" treatment standard)?
- (c) To otherwise avoid a prohibition in O.A.C. Rules 3745-59-30 through 3745-59-35 (40 CFR 268.30 through 268.35)?
- (d) To otherwise avoid a prohibition imposed by Section 3004 of RCRA?

N

NOTE: If the answer to any of the Questions 4(a) through 4(d) above is yes, the entity is impermissibly diluting a restricted waste and is in violation of O.A.C. Rule 3745-59-03 (40 CFR 268.3).

NOTE: Dilution of wastes is permissible under some conditions. See O.A.C. Rule 3745-59-03(B) (40 CFR 268.3) and the Third Third final rule preamble for additional information.

LDR - TREATMENT FACILITY REQUIREMENTS

REQUIRED TREATMENT

Y/N/NA RMK#

Does the facility treat any restricted wastes for which a specified technology (or technologies) has/have been established as the LDR treatment standard?

N

(a) If so, is the facility using the appropriate technology as required by O.A.C. Rule 3745-59-42 (40 CFR 268.42)?

(b) If not, has US EPA granted the facility approval to use an alternative treatment method other than the required technology? [O.A.C. Rule 3745-59-42 (B); 40 CFR 268.42 (b)]

Does the facility treat restricted wastes for which a concentration level has been established as the LDR treatment standard?

If so, does the treatment facility test its waste treatment residues according to the following requirements:

(a) For wastes with treatment standards expressed as a concentration in the waste extract (a CCWE standard found in O.A.C. Rule 3745-59-41; 40 CFR 268.41):

Following treatment, does the treatment facility test the treatment residues or an extract of such residues using the TCLP test to assure that the residues or extract meet the applicable treatment standard? [O.A.C. Rule 3745-59-07(B) (1); 40 CFR 268.7(b) (1)]

(b) For wastes with treatment standards expressed as concentrations in the waste (a CCW standard found in Rule 3745-59-43; 40 CFR 268.43):

Does the treatment facility test treatment residues (not an extract of such residues) using a total constituent analysis to assure that the residues meet applicable treatment standards? [O.A.C. Rule 3745-59-07(B) (3); 40 CFR 268.7(b) (3)]

Does the treatment facility combine waste streams together for the purposes of treatment which have a concentration based LDR treatment standard for the same constituent(s)?

(a) If so, does the treatment facility ensure that the more stringent standard for the mixture is met? [O.A.C. Rule 3745-59-41(B) and 3745-59-43(B); 40 CFR 268.41(b) and 268.43(b)]

↓

OFF-SITE SHIPMENTS - NOTIFICATION/CERTIFICATION REQS.

Y/N/NA

RMK#

4. For all restricted wastes: Does the treatment facility have hazardous waste and/or treatment residues shipped off-site for land disposal?

If so, does the treatment facility provide the land disposal facility with a written notice containing the following:

- (a) EPA hazardous waste number? [3745-59-07(B) (4) (a); 40 CFR 268.7(b) (4) (i)]
- (b) The corresponding treatment standards and applicable prohibitions for each waste? [3745-59-07(B) (4) (b); 40 CFR 268.7(b) (4) (ii)]
- (c) The manifest number associated with the shipment of waste? [3745-59-07(B) (4) (c); 40 CFR 268.7(b) (4) (iii)]
- (d) Waste analysis data, where available? [O.A.C. Rule 3745-59-07(B) (4) (d); 40 CFR 268.7(b) (4) (iv)]

5. Does the facility have any wastes and/or treatment residues shipped off-site for disposal which have been generated from treatment of a restricted waste to meet treatment standards? If so,

For wastes and/or treatment residues generated from the treatment of a waste which has a concentration based treatment standard:

- (a) Does the treatment facility also submit a written certification with each shipment of waste or treatment residue stating that the waste has been treated in compliance with applicable treatment standards? [O.A.C. Rule 3745-59-07(B) (5); 40 CFR 268.7(b) (5)]
- (b) Does the certification contain the language as required by O.A.C. Rule 3745-59-07(B) (5) (a) (40 CFR 268.7(b) (5) (i))?

For wastes and/or treatment residues generated from the treatment of a waste which has a technology based treatment standard:

- (c) With each shipment of treatment residue shipped off-site for disposal, does the treatment facility submit a certification stating that the waste has been treated in accordance with the appropriate treatment technology as specified in O.A.C. Rule 3745-59-42 (40 CFR 268.42)? [O.A.C. Rule 3745-59-07(B) (5); 40 CFR 268.7(b) (5)]

Y/N/NA RMK#

- (d) Is the certification signed by an authorized representative and does it contain the language as specified in O.A.C. Rule 3745-59-07(B) (5) (b) (40 CFR 268.7(b) (5) (ii)?

6. Does the treatment facility have wastes shipped off-site that do not meet treatment standards and/or wastes that must be further managed at a different treatment or storage facility? If so,

- (a) Is the facility complying with the generator notification requirements? [O.A.C. Rule 3745-59-07(B) (6); 40 CFR 268.7(b) (6)]

TREATMENT OF CHARACTERISTIC HAZARDOUS WASTE

7. Does the facility treat characteristic hazardous waste(s) to render such waste(s) non-hazardous?

- (a) If so, are treated waste(s) sent to a licensed solid waste disposal facility?

- i. If so, with each shipment of waste, does the generator submit a notification/certification to the Regional Administrator/Director which contains the following:
- Name and address of the facility receiving the waste? [O.A.C. Rule 3745-59-09(D) (1) (a); 40 CFR 268.9(d) (1) (i)]
 - A description of the waste as initially generated, including EPA hazardous waste numbers and treatability group? [O.A.C. Rule 3745-59-09(D) (1) (b); 40 CFR 268.9(d) (1) (ii)]
 - The treatment standards applicable to the waste at the initial point of generation? [O.A.C. Rule 3745-59-09(D) (1) (c); 40 CFR 268.9(d) (1) (iii)]
- ii. Is the certification signed by an authorized representative and does it contain the language in O.A.C. Rule 3745-59-07(B) (5) (a) (40 CFR 268.7(b) (5) (i)? [O.A.C. Rule 3745-59-09(D) (2); 40 CFR 268.9(d) (2)]

NOTE: Please see the waste analysis/waste analysis plan portion of the CEI checklist for additional questions regarding LDR requirements.

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LDR - LAND DISPOSAL FACILITY REQUIREMENTS

Y/N/NA RMK#

1. Does the land disposal facility retain copies of LDR notices and certifications? [O.A.C. Rule 3745-59-07(C) (1); 40 CFR 268.7(c) (1)] *(Not applicable anymore)*
2. Does the land disposal facility test the waste or an extract of the waste or treatment residue received in accordance with the the facility's waste analysis plan to ensure compliance with applicable LDR treatment standards, including: [O.A.C. Rule 3745-59-07(C) (2); 40 CFR 268.7(c) (2)]
 - (a) Conducting the TCLP to test waste/residues which have a CCWE concentration based treatment standard? [O.A.C. Rule 3745-59-07(C) (2); 40 CFR 268.7(c) (2)]
 - (b) Conducting a total constituent analysis to test waste/residues which have a CCW concentration based treatment standard? [O.A.C. Rule 3745-59-07(C) (2); 40 CFR 268.7(c) (2)]
 - (c) Is testing specified in 2(a) and 2(b) conducted in accordance with the frequency set forth in the facility's waste analysis plan? [O.A.C. Rule 3745-59-07(C) (2); 40 CFR 268.7(c) (2)]

NOTE: Analytical testing of residues which have been generated from treatment of a waste which has a technology based treatment standard only is not required.

3. Where applicable, does the land disposal facility ensure that only restricted wastes/residues which meet applicable concentration based treatment standards of O.A.C. rules 3745-59-41 or 3745-59-43 (268.41 or 268.43) are disposed of? [O.A.C. Rule 3745-59-40(A), (C); 40 CFR 268.40(a), (c)]
4. Where applicable, does the land disposal facility ensure that only restricted wastes/residues which have been treated using the specified technology of O.A.C. Rule 3745-59-42 (40 CFR 268.42) are disposed of? [O.A.C. Rule 3745-59-40(B); 40 CFR 268.40(b)]

NOTE: Please see the waste analysis/waste analysis plan portion of the CEI checklist for additional questions regarding LDR requirements.

LDR - GENERATOR REQUIREMENTS

NOTE: The following requirements apply only to large quantity generators and small quantity generators. Conditionally exempt small quantity generators are exempt from land disposal restriction requirements as referenced in O.A.C. Rules 3745-59-01(E) (1) (40 CFR 268.1(e) (1)) and 3745-51-05(B) (40 CFR 261.5(b)).

EVALUATION OF WASTES/DETERMINING APPROPRIATE TREATMENT STANDARDS

Y/N/NA RMK#

1. Has the generator adequately evaluated all wastes to determine if they are restricted from land disposal? [O.A.C. Rule 3745-59-07(A); 40 CFR 268.7(a)]

Y
- (a) For determinations based solely on knowledge of the waste: Is supporting data used to make this determination being retained on-site? [O.A.C. Rule 3745-59-07(A) (5); 40 CFR 268.7(a) (5)]

Y
- (b) For determinations based upon analytical testing: Is a copy of waste analysis data being retained on-site? [O.A.C. Rule 3745-59-07(A) (5); 40 CFR 268.7(a) (5)]

Y
2. Has the generator determined the correct "treatability group" for each waste restricted from land disposal (e.g. wastewater, non-wastewater, high arsenic, low arsenic, high zinc, low zinc, etc.)? [O.A.C. Rule 3745-59-07(A); 40 CFR 268.7(a)]

Y
3. Has the generator correctly determined if restricted wastes meet or exceed treatment standards? [O.A.C. Rule 3745-59-07(A); 40 CFR 268.7(a)]

Y
4. Does the entity generate any listed waste(s) which are restricted from land disposal? If so,

Y
- (a) Do such wastes also exhibit hazardous waste characteristics as identified in O.A.C. Rules 3745-51-20 to 3745-52-24? (40 CFR 261.20 through 261.24)?

Y

PAH DUST / Acids / Solvents
- (b) For listed wastes which also exhibit a characteristic: Does the generator also identify the appropriate treatment standard for the constituent(s) which cause the waste to exhibit the characteristic(s)? [O.A.C. Rule 3745-59-09(A); 40 CFR 268.9(a)]

Y

NOTE: The generator is not required to identify the treatment standard for the characteristic if the listing covers the associated characteristic (e.g. a F019/D007 hazardous waste - F019 being listed due to chromium content and D007 being the characteristic waste code for chromium). [See O.A.C. Rule 3745-59-09(B); 40 CFR 268.9(b)]

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TREATMENT OF CHARACTERISTIC HAZARDOUS WASTE

Y/N/NA RMK#

5. Does the generator treat characteristic hazardous waste(s) in a RCRA-exempt unit to render such wastes non-hazardous?

✓

N/A

(a) If so, are treated waste(s) sent to a licensed solid waste disposal facility?

✓

i. If so, with each shipment of waste, does the generator submit a notification and certification to the Regional Administrator/Director which contains the following:

a. Name and address of the facility receiving the waste? [O.A.C. Rule 3745-59-09 (D) (1) (a); 40 CFR 268.9 (d) (1) (i)]

N/A

b. A description of the waste as initially generated, including EPA hazardous waste numbers and treatability group? [O.A.C. [Rule 3745-59-09 (D) (1) (b); 40 CFR 268.9 (d) (1) (ii)]

↓

c. The treatment standards applicable to the waste at the initial point of generation? [O.A.C. Rule 3745-59-09 (D) (1) (c); 40 CFR 268.9 (d) (1) (iii)]

ii. Is the certification signed by an authorized representative and does it contain the language in O.A.C. Rule 3745-59-07 (B) (5) (a) (40 CFR 268.7 (b) (5) (i)? [O.A.C. Rule 3745-59-09 (D) (2); 40 CFR 268.9 (d) (2)]

↓

NOTE: An example of a RCRA-exempt unit would include an elementary neutralization unit or a wastewater treatment unit as defined by O.A.C. Rule 3745-50-10. [See O.A.C. Rule 3745-65-01]

REMARKS

NOTIFICATION/CERTIFICATION

Y/N/NA RMK#

For wastes that do not meet treatment standards: Does the generator notify the treatment/storage facility receiving the wastes, in writing, that wastes being received do not meet treatment standards? [O.A.C. Rule 3745-59-07(A) (1); 40 CFR 268.7(a) (1)]

Y — —

If so, does the notification include the following:

(a) EPA hazardous waste number? [O.A.C. Rule 3745-59-07(A) (1) (a); 40 CFR 268.7(a) (1) (i)]

Y — —

(b) Appropriate treatment standard for the waste? [O.A.C. Rule 3745-59-07(A) (1) (b); 40 CFR 268.7(a) (1) (ii)]

Y — —

(c) The manifest number associated with the shipment of waste? [O.A.C. Rule 3745-59-07(A) (1) (c); 40 CFR 268.7(a) (1) (iii)]

Y — —

(d) Waste analysis data, where available? [O.A.C. Rule 3745-59-07(A) (1) (d); 40 CFR 268.7(a) (1) (iv)]

Y — —

7. Is the notification identified in Question #6 submitted with each shipment of waste? [O.A.C. Rule 3745-59-07(A) (1); 40 CFR 268.7(a) (1)]

Y — —

8. For wastes that meet treatment standards: Does the generator submit a written notice and certification to the treatment, storage or disposal facility receiving the wastes stating wastes being received meet applicable treatment standards? [O.A.C. Rule 3745-59-07(A) (2); 40 CFR 268.7(a) (2)]

Y — —

If so, does the notice/certification include the following:

(a) EPA hazardous waste number? [O.A.C. Rule 3745-59-07(A) (2) (a) (i); 40 CFR 268.7(a) (2) (i) (A)]

Y — —

(b) The corresponding treatment standards and applicable prohibitions for the waste? [O.A.C. Rule 3745-59-07(A) (2) (a) (ii); 40 CFR 268.7(a) (2) (i) (B)]

Y — —

(c) The manifest number associated with the shipment of waste? [O.A.C. Rule 3745-59-07(A) (2) (a) (iii); 40 CFR 268.7(a) (2) (i) (C)]

Y — —

(d) Waste analysis data, where available? [O.A.C. Rule 3745-59-07(A) (2) (a) (iv); 40 CFR 268.7(a) (2) (i) (D)]

Y — —

(e) Is the certification signed by the generator or an authorized representative? [O.A.C. Rule 3745-59-07(A) (2) (b); 40 CFR 268.7(a) (2) (ii)]

X — —

Y/N/NA RMK#

9. Is the notification/certification identified in Question #8 submitted with each shipment of waste? [O.A.C. 3745-59-07 (A) (2); 40 CFR 268.7(a) (2)]

Y

10. For wastes subject to a case-by-case extension, exemption or a variance: Does the generator provide written notice to the facility receiving the waste that the waste is not prohibited from land disposal? [O.A.C. Rule 3745-59-07 (A) (3); 40 CFR 268.7(a) (3)]

N/A

If so, does the notice contain the following information:

- (a) EPA hazardous waste number? [O.A.C. Rule 3745-59-07 (A) (3) (a); 40 CFR 268.7(a) (3) (i)]
- (b) The corresponding treatment standard and applicable prohibitions? [O.A.C. Rule 3745-59-07 (A) (3) (b); 40 CFR 268.7(a) (3) (ii)]
- (c) The manifest number associated with the shipment of waste? [O.A.C. Rule 3745-59-07 (A) (3) (c); 40 CFR 268.7(a) (3) (iii)]
- (d) Waste analysis data, where available? [O.A.C. Rule 3745-59-07 (A) (3) (d); 40 CFR 268.6(a) (3) (iv)]
- (e) The date the waste is subject to the prohibitions? [O.A.C. Rule 3745-59-07 (A) (3) (e); 40 CFR 268.7(a) (3) (v)]

Y

11. Does the generator retain on-site a copy of all notices, certifications, demonstrations and waste analysis data for at least five years? [O.A.C. Rule 3745-59-07 (A) (6); 40 CFR 268.7(a) (7)]

Y

REMARKS

TREATMENT OF LDR WASTES IN SURFACE IMPOUNDMENTS

Y/N/NA RMK#

1. Does the owner/operator treat wastes which are prohibited from land disposal in a surface impoundment or series of impoundments? If so, are the following conditions met:
- NO surface impoundment*
- (a) The residues from treatment are analyzed to determine if they meet applicable treatment standards? [O.A.C. Rule 3745-59-04(A) (2) (a); 40 CFR 268.4(a) (2) (i)]
- (b) The sampling method is designed so that representative samples of the sludge and the supernatant are tested separately rather than mixed to form homogeneous samples? [O.A.C. Rule 3745-59-04(A) (2) (a); 40 CFR 268.4(a) (2) (i)]
- (c) Treatment residues (including any liquid waste) which do not meet treatment standards or prohibition levels are removed from the impoundment at least annually? [O.A.C. Rule 3745-59-04(A) (2) (b); 40 CFR 268.4(a) (2) (ii)]
- i. Such residues are not placed in any other surface impoundment? [O.A.C. Rule 3745-59-04(A) (2) (c); 40 CFR 268.7(a) (2) (iii)]
- (d) Procedures and schedules for sampling the impoundment contents, analysis of test data and removal of residues which do not meet treatment standards have been established? [O.A.C. Rule 3745-59-04(A) (2) (d); 40 CFR 268.4(a) (2) (iv)]
- i. Such procedures and schedules are specified in the facility's waste analysis plan as required by O.A.C. Rule 3745-65-13 (265.13)? [O.A.C. Rule 3745-59-04(A) (2) (d); 40 CFR 268.4(a) (2) (iv)]
- ii. A copy of the waste analysis plan has been submitted to the Director? [O.A.C. Rule 3745-59-04(A) (4); 40 CFR 268.4(a) (4)]
- (e) The impoundment meets the design requirements of O.A.C. Rule 3745-56-21(C) (40 CFR 264.221(c)) or 3745-67-21(A) (40 CFR 265.221(a))? [O.A.C. Rule 3745-59-04(A) (3); 40 CFR 268.4(a) (3)]
- (f) The impoundment meets groundwater monitoring requirements (unless exempt from such requirements)? [O.A.C. Rule 3745-59-04(A) (3); 40 CFR 268.4(a) (3)]

N/A



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Y/N/NA RMK#

- (g) The owner/operator has submitted a written certification to the Director which states that the surface impoundment meets the above requirements referenced in Questions 1(a) through (f)? [O.A.C. Rule 3745-59-04(A) (4); 40 CFR 268.4(a) (4)]

N/A

NOTE: Please see the waste analysis/waste analysis plan portion of the CEI checklist for additional questions regarding LDR requirements.

REMARKS

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NOTE: A TSD facility may store Land Disposal Restricted wastes on-site for the purpose of accumulating a sufficient amount of waste for proper recovery, treatment or disposal. [O.A.C. Rule 3745-59-50(B)] During the first of storage, the burden of proof is on Ohio EPA to demonstrate that such storage is not necessary by the facility. Following one year, the burden of proof shifts to the storage facility to demonstrate that such storage of LDR wastes is necessary to facilitate proper recovery, treatment or disposal.

The requirements of O.A.C. Rule 3745-59-50(C) (40 CFR 268.50(c)) found in Question #3 do not apply to those facilities that store hazardous wastes containing PCBs at concentrations greater than or equal to 50 ppm. Please go to Question #4 for applicable requirements.

Y/N/NA RMK#

4. Does the owner/operator store liquid hazardous wastes which also contain PCBs at concentrations greater than or equal to 50 ppm for greater than 90 days (180/270 days if SQG)? If so,
- (a) Does the facility remove from storage and treat or dispose of such PCB hazardous wastes within one year from the date that the wastes were initially placed in storage? [O.A.C. Rule 3745-59-50(F); 40 CFR 268.50(f)]

N/A
↓

NOTE: In addition to complying with the requirement found in Question 4(a), the facility must also meet the requirements of 40 CFR 761.65(b). [O.A.C. Rule 3745-59-50(F); 40 CFR 268.50(f)]

REMARKS

MANIFEST REQUIREMENTS (OAC 3745-52-20 TO 3745-52-23)

[illegible]

1. Does the generator meet the following requirements with respect to the preparation, use and retention of the hazardous waste manifest:
 - a. All hazardous wastes shipped off-site have been accompanied by a completed manifest, USEPA form 8700-22 in compliance with 3745-52-20 (A)?
 - b. The manifest contains all information required by 3745-52-20 and the minimum number of copies required by 3745-52-22?
 - c. The generator has designated at least one permitted disposal facility and has/will designate an alternate facility or instructions to return waste in compliance with 3745-52-20 (C) (D) (E)?
 - d. Prepared manifests have been signed by the generator and initial transporter in compliance with 3745-52-23 (A) (1) (2)?
2. Has the generator received a return copy of each completed manifest within thirty-five (35) days of the date the waste was accepted by the initial transporter?
 - a. If not, has the generator complied with the manifest exception reporting requirements in 3745-52-42?

NOTE: The manifest exception reporting requirement identified in Question #2 above is applicable to large quantity generators only. See Question #3 for manifest exception reporting requirements for small quantity generators.

3. If the generator is acting as a small quantity generator, (> 100 kg but < 1000 kg of hazardous waste in a calendar month) has the generator received a return copy of each completed manifest within sixty days of receipt by the initial transporter? [3745-52-42(B)]
 - a. If not, did the generator submit a legible copy of the manifest with some indication that the generator has not received confirmation of delivery to the Ohio EPA? [3745-52-42(B)]
4. Are signed copies of all hazardous waste manifests and any documentation required for Exception Reports retained for at least 3 years as required by 3745-52-40?

(5/29/92)

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GENERATOR CLOSURE REQUIREMENTS (3745-52-34)

Y/N/NA RMK #

1. Has the generator closed any < 90-day accumulation unit(s) since date of last inspection?

N

If so, describe the unit(s) which the generator has closed:

2. If the generator has closed any < 90-day accumulation unit(s) as described in Question #1, was closure completed to meet the closure performance standard of 3745-66-11? [3745-52-34 (A) (1)]

N/A

Please provide a description of the type of documentation provided by the generator to confirm that closure was completed in accordance with the closure performance standard:

3. If the < 90 day unit closed was a tank system, did the generator also complete closure in accordance with the tank system closure requirements of 3745-66-97 (A) and (B)? [3745-52-34 (A) (1)]

N/A

REMARKS - GENERATOR CLOSURE REQUIREMENTS

PERMIT STATUS

GENERAL REQUIREMENTS

Y/N/NA RMK #

1. Has the owner/operator submitted a Part A application to Ohio EPA in accordance with OAC 3745-50-40?

Old Co. did. New Co. CSO do not need to.

When was the owner/operator's Part A submitted:

2. Is the owner/operator operating in compliance with the terms and conditions of its HWFB permit?

If not, has a Permit Change Request (PCR) been submitted in accordance with 3745-50-51?

If yes, what date was the PCR submitted?

3. Has the owner/operator submitted a Part B?

PERMIT BY RULE REQUIREMENTS

4. Has there been a rule or statute change which has caused the owner/operator to become subject to Ohio's hazardous waste facility permitting requirements?

a. If so, please describe the rule change below:

b. What was the effective date of the rule or statute change in Ohio?

c. Did the owner/operator submit a Part A to the Director in accordance with the requirements of OAC rule 3745-50-40 (C) (D)?

NOTE: In accordance with 3745-50-40 (D), owners/operators are required to submit the Part A within 30 days after the date they first become subject to Ohio's TSD facility standards. Small quantity generators who treat, store or dispose of wastes were required to submit a Part A by the effective date OAC Rule 3745-50-40. [See OAC Rule 3745-50-40]

d. Did the owner/operator notify the US EPA of its hazardous waste activity? [3745-50-40 (C) (1) (a)]

i. What was the date of notification?

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OAC 3745-65-et seq. GENERAL FACILITY STANDARDS

IDENTIFICATION NUMBER (OAC 3745-65-11)

Y/N/NA RMK #

1. Has the facility owner/operator received an identification number from Ohio EPA (or US EPA) as required by OAC 3745-65-11?

Y

ANNUAL REPORT REQUIREMENT (OAC 3745-65-75)

2. Has the owner/operator submitted an annual Treatment-Storage-Disposal report to the Director of Ohio EPA by MARCH 1st of each calendar year? [3745-65-75]

N/A

Not TSD
WASTE ANALYSIS/WASTE ANALYSIS PLAN (OAC 3745-65-13)

3. Does the owner/operator (o/o) have a detailed chemical and physical analysis of the waste material containing all of the information which must be known to properly treat, store or dispose of the waste as required by 3745-65-13 (A) (1)?

N/A

4. Is the waste analysis repeated when a process or operation generating hazardous waste changes? [3745-65-13 (A) (3) (a)]

↓

5. For off-site facilities; Is the waste analysis repeated when results of inspections under 3745-65-13 (A) (4) reveal hazardous waste received at the facility does not match the waste designated on the accompanying manifest? [3745-65-13 (A) (3) (b)]

N/A

6. Does o/o have a written waste analysis plan which includes the following information [3745-65-13 (B) (1) through (6)]:

Y

- a. The parameters for which each hazardous waste will be analyzed and rationale for the selection of these parameters? [3745-65-13 (B) (1)]

Y

- b. The test methods to be used? [3745-65-13 (B) (2)]

Y

- c. The sampling method which will be used, either one of the sampling methods described in Appendix I of 3745-51-20 or an equivalent method as defined in OAC 3745-50-10? [3745-65-13 (B) (3) (a) (b)]

Y

- d. The frequency with which the initial analysis of the waste will be reviewed/repeated to ensure that the analysis is accurate and up-to-date? [3745-65-13 (B) (4)]

Y

- e. FOR OFF-SITE FACILITIES: The waste analysis that hazardous waste generators have agreed to supply? [3745-65-13 (B) (5)]

N/A

Y/N/NA RMK #

f. **FOR OFF-SITE FACILITIES:** The sampling methods and procedures which will be used to inspect and, if necessary, analyze each movement of hazardous waste received at the facility to ensure that it matches the identification of the waste on the manifest [3745-65-13(C)]?

N/A

g. **FOR FACILITIES OPERATING SURFACE IMPOUNDMENTS EXEMPT FROM LAND DISPOSAL RESTRICTIONS UNDER 3745-59-04 (A):**

N/A

Does the waste analysis plan include procedures and schedules for:

- i. The sampling of impoundment contents? [3745-65-13(B) (7)]
- ii. The analysis of test data? [3745-65-13(B) (7)]
- iii. The annual removal of residues which are not delisted or which exhibit the characteristic of a hazardous waste and either do not meet treatment standards (3745-59-44) or where no treatment standards have been established? [3745-65-13(B) (7)]

↓

h. **Where applicable:** The methods which will be used to meet the additional waste analysis requirements of rules 3745-59-07, 3745-67-25, 3745-67-52, 3745-67-73, 3745-68-14, 3745-68-41, 3745-68-75 and 3745-69-02 of the OAC? [3745-65-13(B) (6)]

WASTE ANALYSIS PLAN - LDR REQUIREMENTS

NOTE: The following requirements identified in Question #7 apply to both on-site and off-site TSD facilities.

7. ^{not TSD} In accordance with OAC Rule 3745-65-13(B) (6), does the the facility's waste analysis plan includes analytical procedures necessary to ensure compliance with the land disposal restriction requirements of Chapter 3745-59, including:

- a. Procedures for conducting the TCLP for wastes which have a CCWE treatment standard?
- b. Procedures for conducting a total constituent analysis for wastes which have a CCWE treatment standard?

N/A

N/A

40
OPERATING RECORD REQUIREMENTS (OAC 3745-65-73)

Y/N/NA RMK #

1. Does the o/o maintain a written operating record at the facility as required by 3745-65-73 which contains the following information:
 - a. Description and quantity of each hazardous waste treated, stored or disposed of within the facility and the date and method pertinent to such treatment, storage or disposal? [3745-65-73 (B) (1)]
 - b. As required by the Appendix to 3745-65-73, does the information specified in Question 1a include:
 - i. Common name, EPA hazardous waste identification number and physical state (solid, liquid, gas) of the waste?
 - ii. The estimated (or actual) weight, volume or density of the waste?
 - iii. A description of the method(s) used to treat, store or dispose of the waste using the EPA handling codes listed in Table 2 of OAC 3745-65-73?
 - c. The present physical location of each hazardous waste within the facility and cross references to specific manifest document numbers?
 - d. Records of incidents which required implementation of the contingency plan?
 - e. Records of any waste analyses and trial tests required to be performed?
 - f. Records of the inspections required by the general inspection requirements under 3745-65-15?
 - g. Records of any monitoring, or analytical data required under other subparts as referenced by 3745-65-73 (B) (6)?
 - h. **FOR DISPOSAL FACILITIES**, location and quantity of each hazardous waste recorded on a facility map and cross-references to manifest document numbers? [3745-65-73 (B) (2)]
 - i. Records of closure cost estimates and post-closure (DISPOSAL ONLY) cost estimates required by OAC 3745-66?

Y

Y

Y

Y

Y

Y

N/A

Y/N/NA RMK #

2. Does the operating record include documentation required to be maintained under the land disposal restriction requirements of Chapter 3745-59? [3745-65-73(b) (9) through (14)]

↓

NOTE: The following recordkeeping requirements are applicable only to off-site TSDS.

3. Are manifests received by the facility signed and dated? [3745-65-71(A) (1)]
4. Is one copy given to the transporter, one copy sent to the generator within 30 days and one copy kept for at least 3 years? [3745-65-71(A)]
- a. If shipping papers are used in lieu of manifests (bulk shipments, etc.), are the same requirements met [3745-65-71(B)]?
- b. Are any significant discrepancies in the manifest, as defined in 3745-65-72(A) noted in writing on the manifest document?
5. Have any manifest discrepancies been reconciled within 15 days as required by 3745-65-72(B) or has the o/o submitted the required information to the Director?
6. If the facility has accepted any unmanifested hazardous wastes from off-site sources for treatment, storage, or disposal, has an unmanifested waste report containing all the information required by 3745-65-76(A) been submitted to the Director within 15 days?

N/A

REMARKS - OPERATING RECORD REQUIREMENTS

42
GENERAL INSPECTION REQUIREMENTS (OAC 3745-65-15)

Y/N/NA RMK #

1. Does the o/o inspect the facility on a weekly basis for malfunctions, deterioration, operator errors and discharges which may cause a release of hazardous waste or hazardous waste constituents or may pose a threat to human health? [3745-65-15(A) (1) (2)] If so,
 - a. Are the inspections recorded in an inspection log or summary as required by 3745-65-15(D)? [3745-65-15(A)]
 - b. Do records contain date and time of inspection, name of inspector, notation of observations made and date and nature of any repairs or remedial actions as required by 3745-65-15(D)? [3745-65-15(A)]
 - c. Are inspection records maintained at the facility for at least (3) years as required by 3745-65-15(D)? [3745-65-15(A)]
2. Has the owner/operator developed a written inspection schedule for inspecting; monitoring equipment, safety equipment, emergency equipment, security devices and operating and structural equipment (e.g. dikes, sumps)? [3745-65-15(B)] If so,
 - a. Is the schedule kept at the facility? [3745-65-15(B) (2)]
 - b. Does the schedule identify the types of problems which are to be looked for during the inspection? [3745-65-15(B) (3)]
 - c. Does the schedule include inspection of areas subject to spills (i.e. loading and unloading areas) daily when in use and according to other applicable regulations when not in use? [3745-65-16(B) (4)]

Y
Y
Y
Y
Y
Y
Y
Y

NOTE: See Preparedness and Prevention checklist for additional testing/recordkeeping requirements applicable to emergency equipment.

REMARKS - GENERAL INSPECTION REQUIREMENTS

SECURITY REQUIREMENTS (OAC 3745-65-14)

Y/N/NA RMK #

1. a. Would physical contact with the waste structures or equipment injure unknowing/unauthorized person or livestock entering the facility? [3745-65-14 (A) (1)]
entire facility under fence w/ signs
b. Would disturbance of the waste cause a violation of the hazardous waste regulations? [3745-65-14 (A) (2)]

Y _____

IF BOTH 1A AND 1B ARE NO, MARK QUESTIONS 2 AND 3 NOT APPLICABLE.

2. Does the facility have -
a. A 24-hour surveillance system, or;
b. An artificial or natural barrier and a means to control entry at all times? [3745-65-14 (B) (2) (a) (b)]
Chain Fence
3. Does the facility have a sign "Danger-Unauthorized Personnel Keep Out" at each entrance to the active portion of the facility and at other locations as necessary? [3745-65-14 (C)]

N _____
Y _____
Y _____

REMARKS - SECURITY REQUIREMENTS

QAC 3745-66 CLOSURE AND POST CLOSURE

Y/N/NA RMK #

1. Is a written closure plan on file at the facility which contains the following elements: [3745-66-12]?
(Not anymore)
 - a. A description of how each hazardous waste management unit will be closed in accordance with 3745-66-11?
 - b. A description of how final closure will meet the requirements of 3745-66-11?
 - c. An estimate of the maximum amount of hazardous waste ever in inventory?
 - d. A description of steps taken to remove or decontaminate facility equipment containment systems, structures, soils, and all hazardous waste residues?
 - e. The year closure is expected to begin and a schedule for the various phases of closure?
 - f. A description of other activities necessary to ensure closure with the performance standards including ground water monitoring, leachate collection, and run-off control?
2. Has the closure plan (and post-closure plan, if applicable) been amended 60 days prior to any changes in facility design, processes, or closure dates or 60 days after an unexpected event occurs which affects the closure plan? [3745-66-12(C)]
3. Has the closure plan (and post-closure plan, if applicable) for surface impoundment, waste pile, land treatment or landfill units been submitted to the Director 180 days prior to beginning the closure process? [3745-66-12(D)]
4. Has the closure plan (and post-closure plan, if applicable) for any non land disposal unit(s) been submitted to the Director 45 days prior to beginning the closure process? [3745-66-12(D)]
5. Within 90 days of receipt of the final volume of waste or Director's plan approval, if that is later, was all hazardous waste treated, removed, or disposed in accordance with the approved plan? [3745-66-13(A)]
6. Was closure completed in accordance with the approved plan within 180 days after receipt of final volume of waste or approval of the plan, if that is later? [3745-66-13(B)]
7. Did the owner/operator submit to the Director, within sixty (60) days after completion of closure, certification by both the owner/operator and an independent registered professional engineer that the facility has been closed in accordance with the approved closure plan? [3745-66-15]

Y/N/NA RMK #

8. Did the owner/operator submit to the local zoning authority and the Director a survey plat in accordance with OAC 3745-66-16?

N/A
9. What permitted units at the facility have been closed in accordance with an approved closure plan?

10. If closure was partial, list the regulated units which remain in use at the facility:

11. If required, has the facility prepared a written post-closure plan? [3745-66-18]

If so, does the post-closure plan include:

 - a. A description of proposed ground water monitoring?

 - b. A description of planned maintenance activities?

 - c. The name, address and phone number of person/office to contact during the post-closure period?

12. For disposal facilities; has the owner/operator submitted to local land authorities and the Director a survey plat within 60 days after certification of closure? [3745-66-19]

13. Has the owner of the property on which a disposal unit is located recorded on the deed that:

 - a. The land has been used to manage hazardous waste and the type, quantity and location of waste?

 - b. Land use is restricted under closure and post-closure rules? [3745-66-19]

REMARKS - CLOSURE/POST CLOSURE REQUIREMENTS

46

OAC 3745-68 LANDFILLS

GENERAL OPERATING REQUIREMENTS

Y/N/NA RMK #

1. Does the facility provide the following:

- a. Run-on control capable of handling a 24-hr, 25-yr storm? [3745-68-02(A)]
- b. Run-off control capable of handling a 24-hr, 25-yr storm? [3745-68-02(B)]
- c. If run-off is hazardous waste, is it managed in accordance with applicable rules? [3745-68-02(B)]
- d. Are facilities associated with run-on and run-off control systems managed to maintain design capacity after rain events? [3745-68-02(C)]
- e. Control of wind dispersal of hazardous waste? [3745-68-02(D)]

N/A
↓

REMARKS - LANDFILL GENERAL OPERATING REQUIREMENTS

None

SURVEYING AND RECORDKEEPING REQUIREMENTS

2. Does the operating record include the following information as required by OAC 3745-68-09:

- a. A map showing the exact location and dimensions of each cell? [3745-68-09(A)]
- b. The contents of each cell and the location of each hazardous waste type within each cell? [3745-68-09(B)]

N/A
↓

Y/N/NA RMK #

3. Are ignitable or reactive wastes treated so the resulting mixture is no longer ignitable or reactive? [3745-68-12]

N/A

NOTE: If waste is rendered non-reactive or non-ignitable, see treatment requirements. If not, the provisions of 3745-65-17 and 3745-68-12(b) apply.

4. Does the owner/operator dispose of incompatible wastes in separate cells? [3745-68-13] If not, the provisions of 3745-68-15 apply.
5. Are empty containers crushed flat, shredded, or similarly reduced in volume before being buried beneath the surface of the landfill? [3745-68-15]
6. Are containers at least 90% full prior to placement in the landfill?
7. Is bulk or non-containerized liquid waste or waste containing free liquids treated so that free liquids are no longer present? [3745-68-14(A)]
8. Are containers other than lab packs, ampules, batteries or capacitors holding free liquids placed in the landfill? [3745-68-14(B)]
 - a. If yes, has all free liquid been removed, absorbed or otherwise eliminated?
9. Has the owner/operator employed Method 9095 (Paint Filter Liquids Test) to demonstrate the absence of free liquids in containerized or bulk waste? [3745-68-14(D)]
10. Are the special requirements for lab pack waste met? [3745-68-16]

REMARKS - SURVEYING AND RECORDKEEPING REQUIREMENTS

48

LANDFILL CLOSURE AND POST CLOSURE REQUIREMENTS

Y/N/NA RMK #

11. Is a written closure/post-closure plan available for inspection at the facility? [3745-66-12]
12. Has the closure/post-closure plan been amended 60 days prior to any changes in facility design, or operation, or no later than 60 days after an unexpected event has occurred which has effected the closure plan? [3745-66-18(D)]
13. Has the closure/post-closure plan been submitted to the Director 180 days prior to beginning closure? [3745-66-18(E)]
14. Does the plan contain information required in 3745-68-10?
15. Is a closure cost estimate available?
16. Has closure begun?
17. Has the property owner attached a notation to the property deed or other instrument which will notify any potential purchaser that the property has been used to manage hazardous waste and future use of the property is restricted under 3745-66-17(C) as required in 3745-66-19?

N/A

N/A

N/A

N/A

N/A

N/A

N/A

REMARKS - LANDFILL CLOSURE/POST-CLOSURE REQUIREMENTS

OAC 3745-66 CLOSURE AND POST CLOSURE

Y/N/NA RMK

1. Is a written closure plan on file at the facility which contains the following elements: [3745-66-12]?
(Not anymore)
 - a. A description of how each hazardous waste management unit will be closed in accordance with 3745-66-11?
 - b. A description of how final closure will meet the requirements of 3745-66-11?
 - c. An estimate of the maximum amount of hazardous waste ever in inventory?
 - d. A description of steps taken to remove or decontaminate facility equipment containment systems, structures, soils, and all hazardous waste residues?
 - e. The year closure is expected to begin and a schedule for the various phases of closure?
 - f. A description of other activities necessary to ensure closure with the performance standards including ground water monitoring, leachate collection, and run-off control?
2. Has the closure plan (and post-closure plan, if applicable) been amended 60 days prior to any changes in facility design, processes, or closure dates or 60 days after an unexpected event occurs which affects the closure plan? [3745-66-12(C)]
3. Has the closure plan (and post-closure plan, if applicable) for surface impoundment, waste pile, land treatment or landfill units been submitted to the Director 180 days prior to beginning the closure process? [3745-66-12(D)]
4. Has the closure plan (and post-closure plan, if applicable) for any non land disposal unit(s) been submitted to the Director 45 days prior to beginning the closure process? [3745-66-12(D)]
5. Within 90 days of receipt of the final volume of waste or Director's plan approval, if that is later, was all hazardous waste treated, removed, or disposed in accordance with the approved plan? [3745-66-13(A)]
6. Was closure completed in accordance with the approved plan within 180 days after receipt of final volume of waste or approval of the plan, if that is later? [3745-66-13(B)]
7. Did the owner/operator submit to the Director, within sixty (60) days after completion of closure, certification by both the owner/operator and an independent registered professional engineer that the facility has been closed in accordance with the approved closure plan? [3745-66-15]

50
SECURITY REQUIREMENTS (OAC 3745-65-14)

Y/N/NA RMK #

1. a. Would physical contact with the waste structures or equipment injure unknowing/unauthorized person or livestock entering the facility? [3745-65-14(A)(1)]
entire facility under fence w/ signs
- b. Would disturbance of the waste cause a violation of the hazardous waste regulations? [3745-65-14(A)(2)]

Y _____

IF BOTH 1A AND 1B ARE NO, MARK QUESTIONS 2 AND 3 NOT APPLICABLE.

2. Does the facility have -
 - a. A 24-hour surveillance system, or;
 - b. An artificial or natural barrier and a means to control entry at all times? [3745-65-14(B)(2)(a)(b)]
Chain Fence
3. Does the facility have a sign "Danger-Unauthorized Personnel Keep Out" at each entrance to the active portion of the facility and at other locations as necessary? [3745-65-14(C)]

N _____
Y _____
Y _____

REMARKS - SECURITY REQUIREMENTS

GENERAL INSPECTION REQUIREMENTS (OAC 3745-65-15)

Y/N/NA RMK #

1. Does the o/o inspect the facility on a weekly basis for malfunctions, deterioration, operator errors and discharges which may cause a release of hazardous waste or hazardous waste constituents or may pose a threat to human health? [3745-65-15(A) (1) (2)] If so,
 - a. Are the inspections recorded in an inspection log or summary as required by 3745-65-15(D)? [3745-65-15(A)]
 - b. Do records contain date and time of inspection, name of inspector, notation of observations made and date and nature of any repairs or remedial actions as required by 3745-65-15(D)? [3745-65-15(A)]
 - c. Are inspection records maintained at the facility for at least (3) years as required by 3745-65-15(D)? [3745-65-15(A)]
2. Has the owner/operator developed a written inspection schedule for inspecting; monitoring equipment, safety equipment, emergency equipment, security devices and operating and structural equipment (e.g. dikes, sumps)? [3745-65-15(B)] If so,
 - a. Is the schedule kept at the facility? [3745-65-15(B) (2)]
 - b. Does the schedule identify the types of problems which are to be looked for during the inspection? [3745-65-15(B) (3)]
 - c. Does the schedule include inspection of areas subject to spills (i.e. loading and unloading areas) daily when in use and according to other applicable regulations when not in use? [3745-65-16(B) (4)]

Y
Y
Y
Y
Y
Y
Y
Y

NOTE: See Preparedness and Prevention checklist for additional testing/recordkeeping requirements applicable to emergency equipment.

REMARKS - GENERAL INSPECTION REQUIREMENTS

- 52
2. Does the operating record include documentation required to be maintained under the land disposal restriction requirements of Chapter 3745-59? [3745-65-73(b)(9) through (14)]

↓

NOTE: The following recordkeeping requirements are applicable only to off-site TSDS.

3. Are manifests received by the facility signed and dated? [3745-65-71(A)(1)]
4. Is one copy given to the transporter, one copy sent to the generator within 30 days and one copy kept for at least 3 years? [3745-65-71(A)]
- a. If shipping papers are used in lieu of manifests (bulk shipments, etc.), are the same requirements met [3745-65-71(B)]?
- b. Are any significant discrepancies in the manifest, as defined in 3745-65-72(A) noted in writing on the manifest document?
5. Have any manifest discrepancies been reconciled within 15 days as required by 3745-65-72(B) or has the o/o submitted the required information to the Director?
6. If the facility has accepted any unmanifested hazardous wastes from off-site sources for treatment, storage, or disposal, has an unmanifested waste report containing all the information required by 3745-65-76(A) been submitted to the Director within 15 days?

N/A

REMARKS - OPERATING RECORD REQUIREMENTS

OPERATING RECORD REQUIREMENTS (OAC 3745-65-73)

Y/N/NA RMK #

1. Does the o/o maintain a written operating record at the facility as required by 3745-65-73 which contains the following information:
 - a. Description and quantity of each hazardous waste treated, stored or disposed of within the facility and the date and method pertinent to such treatment, storage or disposal? [3745-65-73 (B) (1)]
 - b. As required by the Appendix to 3745-65-73, does the information specified in Question 1a include:
 - i. Common name, EPA hazardous waste identification number and physical state (solid, liquid, gas) of the waste?
 - ii. The estimated (or actual) weight, volume or density of the waste?
 - iii. A description of the method(s) used to treat, store or dispose of the waste using the EPA handling codes listed in Table 2 of OAC 3745-65-73?
 - c. The present physical location of each hazardous waste within the facility and cross references to specific manifest document numbers?
 - d. Records of incidents which required implementation of the contingency plan?
 - e. Records of any waste analyses and trial tests required to be performed?
 - f. Records of the inspections required by the general inspection requirements under 3745-65-15?
 - g. Records of any monitoring, or analytical data required under other subparts as referenced by 3745-65-73 (B) (6)?
 - h. **FOR DISPOSAL FACILITIES**, location and quantity of each hazardous waste recorded on a facility map and cross-references to manifest document numbers? [3745-65-73 (B) (2)]
 - i. Records of closure cost estimates and post-closure (DISPOSAL ONLY) cost estimates required by OAC 3745-66?

Y

Y

Y

Y

Y

Y

N/A

- f. **FOR OFF-SITE FACILITIES:** The sampling methods and procedures which will be used to inspect and, if necessary, analyze each movement of hazardous waste received at the facility to ensure that it matches the identification of the waste on the manifest [3745-65-13 (C)]?

N/A

- g. **FOR FACILITIES OPERATING SURFACE IMPOUNDMENTS EXEMPT FROM LAND DISPOSAL RESTRICTIONS UNDER 3745-59-04 (A):**

N/A

Does the waste analysis plan include procedures and schedules for:

- i. The sampling of impoundment contents? [3745-65-13 (B) (7)]
 - ii. The analysis of test data? [3745-65-13 (B) (7)]
 - iii. The annual removal of residues which are not delisted or which exhibit the characteristic of a hazardous waste and either do not meet treatment standards (3745-59-44) or where no treatment standards have been established? [3745-65-13 (B) (7)]
- h. **Where applicable:** The methods which will be used to meet the additional waste analysis requirements of rules 3745-59-07, 3745-67-25, 3745-67-52, 3745-67-73, 3745-68-14, 3745-68-41, 3745-68-75 and 3745-69-02 of the OAC? [3745-65-13 (B) (6)]

WASTE ANALYSIS PLAN - LDR REQUIREMENTS

NOTE: The following requirements identified in Question #7 apply to both on-site and off-site TSD facilities.

7. In accordance with OAC Rule 3745-65-13 (B) (6), does the the facility's waste analysis plan includes analytical procedures necessary to ensure compliance with the land disposal restriction requirements of Chapter 3745-59, including:

- a. Procedures for conducting the TCLP for wastes which have a CCWE treatment standard?
- b. Procedures for conducting a total constituent analysis for wastes which have a CCWE treatment standard?

N/A

N/A

OAC 3745-65-et seq. GENERAL FACILITY STANDARDS

IDENTIFICATION NUMBER (OAC 3745-65-11)

Y/N/NA RMK #

1. Has the facility owner/operator received an identification number from Ohio EPA (or US EPA) as required by OAC 3745-65-11?

Y _____

ANNUAL REPORT REQUIREMENT (OAC 3745-65-75)

2. Has the owner/operator submitted an annual Treatment-Storage-Disposal report to the Director of Ohio EPA by March 1st of each calendar year? [3745-65-75]

N/A _____

WASTE ANALYSIS/WASTE ANALYSIS PLAN (OAC 3745-65-13)

3. Does the owner/operator (o/o) have a detailed chemical and physical analysis of the waste material containing all of the information which must be known to properly treat, store or dispose of the waste as required by 3745-65-13 (A) (1)?

N/A _____

4. Is the waste analysis repeated when a process or operation generating hazardous waste changes? [3745-65-13 (A) (3) (a)]

Y _____

5. For off-site facilities; Is the waste analysis repeated when results of inspections under 3745-65-13 (A) (4) reveal hazardous waste received at the facility does not match the waste designated on the accompanying manifest? [3745-65-13 (A) (3) (b)]

N/A _____

6. Does o/o have a written waste analysis plan which includes the following information [3745-65-13 (B) (1) through (6)]:

Y _____

- a. The parameters for which each hazardous waste will be analyzed and rationale for the selection of these parameters? [3745-65-13 (B) (1)]

Y _____

- b. The test methods to be used? [3745-65-13 (B) (2)]

Y _____

- c. The sampling method which will be used, either one of the sampling methods described in Appendix I of 3745-51-20 or an equivalent method as defined in OAC 3745-50-10? [3745-65-13 (B) (3) (a) (b)]

Y _____

- d. The frequency with which the initial analysis of the waste will be reviewed/repeated to ensure that the analysis is accurate and up-to-date? [3745-65-13 (B) (4)]

Y _____

- e. **FOR OFF-SITE FACILITIES:** The waste analysis that hazardous waste generators have agreed to supply? [3745-65-13 (B) (5)]

N/A _____

56.

PERMIT STATUS

GENERAL REQUIREMENTS

Y/N/NA RMK #

1. Has the owner/operator submitted a Part A application to Ohio EPA in accordance with OAC 3745-50-40?

Old Co. did. New Co. CSO do not need to.
When was the owner/operator's Part A submitted:

2. Is the owner/operator operating in compliance with the terms and conditions of its HWFB permit?

If not, has a Permit Change Request (PCR) been submitted in accordance with 3745-50-51?

If yes, what date was the PCR submitted?

3. Has the owner/operator submitted a Part B?

PERMIT BY RULE REQUIREMENTS

4. Has there been a rule or statute change which has caused the owner/operator to become subject to Ohio's hazardous waste facility permitting requirements?

a. If so, please describe the rule change below:

b. What was the effective date of the rule or statute change in Ohio?

c. Did the owner/operator submit a Part A to the Director in accordance with the requirements of OAC rule 3745-50-40 (C) (D)?

NOTE: In accordance with 3745-50-40 (D), owners/operators are required to submit the Part A within 30 days after the date they first become subject to Ohio's TSD facility standards. Small quantity generators who treat, store or dispose of wastes were required to submit a Part A by the effective date OAC Rule 3745-50-40. [See OAC Rule 3745-50-40]

d. Did the owner/operator notify the US EPA of its hazardous waste activity? [3745-50-40 (C) (1) (a)]

i. What was the date of notification?

SUBPART CC
INSPECTION CHECKLIST FOR RCRA WASTE OPERATIONS
MULTIMEDIA

1. Name of corporation, company, or individual owner:

CSC, LTD (Previously known as Copperweld
Steel Co.)

2. Mailing Address:

4000 Mahoning Ave

Warren OH 44483 - 1968

3. Facility Address:

AS ABOVE

4. Source Info (ID Number, date of permit, permit expiration, etc.):

ID # OHR 000007773

5. Name and Title of Contact:

JACK A. VANKIRK, ENV. MGR, CSC

6. Telephone Number:

216 - 835 - 5200

7. Date of Inspection, Time of Day, Weather Conditions:

6-24-97

8. Name and title of Government Official Conducting Inspection:

S. SIRTAT AHMED USEPA

9. Pre-inspection interview:

JACK VANKIRK CSC Mgr-Envr.

JOSEPH R FORD CSC Mgr Safety

10. Post-inspection interview:

AS ABOVE

11. Additional comments:

**VISUAL INSPECTION CHECKLIST FOR
FIXED ROOF STORAGE TANKS [§265.1085(c)] AND FIXED ROOF TANKS
WITH A CLOSED VENT SYSTEM AND CONTROL DEVICE [§265.1085(g)]**

Equipment	Visual Inspection Procedures	Field Observations
1. Fixed Roof	<p>Visually determine that the tank is a fixed roof tank. Is the roof a separate cover or part of the tank structural design? What is the roof material of construction?</p> <p>Inspect the periphery of the tank for possible leaks in the shell, valves, flanges and pumps. Note any liquid accumulations from tank appurtenances or evidence of corrosion especially on the tank shell or roof.</p> <p>Inspect the fixed roof for possible visible cracks, holes, gaps or other open spaces between roof sections or tank wall</p> <p>What is the maximum organic vapor pressure of the hazardous waste in the tank? What is the tank's normal organic vapor pressure? Is there a pressure gauge on the tank for continuous readout?</p> <p>What are the maximum and minimum flow-weighted annual average volatile organic contents of the hazardous waste streams managed in the tank?</p> <p>What is the design capacity of the tanks? What is the actual volume held in the tank?</p>	

**VISUAL INSPECTION CHECKLIST FOR
FIXED ROOF STORAGE TANKS [§265.1085(c)] AND FIXED ROOF TANKS
WITH A CLOSED VENT SYSTEM AND CONTROL DEVICE [§265.1085(g)]**

Equipment	Visual Inspection Procedures	Field Observations
	<p>What is the withdrawal/filling schedule for the tank? When was the tank last emptied and refilled?</p> <p>Which standard for tanks has the facility elected to comply with? [§265.1085(c) or (g)]</p>	
2. Closed Vent System	<p>Is there a closed vent system associated with the fixed roof tank?</p> <p>Visually inspect the closed vent system from the ground and platform if accessible. Note visible gaps, holes or corrosion spots seen in the ductwork of the closed vent system.</p>	
3. Control Device	<p>Is there a control device connected to the closed vent system?</p> <p>What type of control device is used?</p> <p>Is the control device operational?</p> <p>Check piping valves and fittings for visible leaks.</p> <p>What type of continuous monitoring device is used? Is the device operational? What parameter is the device monitoring? Note level monitored and compare with design levels from facility reports during record inspection.</p>	

**VISUAL INSPECTION CHECKLIST FOR
EXTERNAL FLOATING ROOF STORAGE TANK [S265.1085(f)]**

Equipment	Visual Inspection Procedures	Field Observations
1. External Floating Roof (EFR)	<p>The inspector should not perform the inspection while on the EFR if the roof is below four feet of the top of the tank or if the inspector is not equipped with the proper respiratory protection. An adequate inspection can be performed with a combination of a record inspection and a visual inspection performed from the platform with the aid of visually enhancing devices (binoculars).</p> <p>Using the level of the EFR and the current volume stored in the tank, determine that the EFR is resting on the liquid surface. While wearing proper respiratory protection, pull back the primary seal to observe the level of the waste.</p> <p>Visually inspect the condition of the external floating roof. Note the condition (corrosion free, small pits in surface, pools of standing liquid, visible corrosion spots etc.).</p> <p>*Note: See Figure 1 for diagram</p>	
2. Closure Device	<p>Determine that a closure device (seal) is between the wall of the storage tank and the roof edge. This can be performed for the secondary seal by visual inspection from the platform.</p>	

**VISUAL INSPECTION CHECKLIST FOR
EXTERNAL FLOATING ROOF STORAGE TANK [S265.1085(f)]**

Equipment	Visual Inspection Procedures	Field Observations
a.Primary Seal	<p>While wearing proper respiratory protection, visually inspect the primary seal for cracks, gaps or tears by pulling back the secondary seal. Otherwise the inspection should be done by consulting facility records.</p> <p>Determine that the seal is either a metallic shoe seal or a liquid-mounted seal (in contact with the liquid). Check that the seal is continuous around the tank.</p> <p>Determine that the gaps between the wall and seal do not exceed 212 cm² per meter (10.0 in² per foot) of vessel diameter and the gap widths do not exceed 3.8 cm (1.5 in.). This can be done by measuring the gaps in the seals with dowels of various diameters, while using proper respiratory protection, or by consulting facility records. Measurements should be recorded for at least four locations along the tank.</p>	
i. Metallic Shoe	<p>For metallic shoe seals, check that there is a flexible coated fabric that spans the space between the metal shoe and the vessel wall. Determine that one end of the metallic shoe seal extends into the stored liquid and the other extends a minimum vertical distance of 61 cm (24 inches) above the liquid surface. This can be done by using a hooked probe or by consulting the facility design records that indicate the metallic shoe seal dimensions.</p> <p>Identify any corrosion, holes, tears or other openings in the shoe, flexible seal fabric, or seal envelope.</p>	

**VISUAL INSPECTION CHECKLIST FOR
EXTERNAL FLOATING ROOF STORAGE TANK [S265.1085(f)]**

Equipment	Visual Inspection Procedures	Field Observations
ii. Liquid-Mounted	<p>If the secondary seal is pulled back, observe that the seal is in contact with the liquid between the wall of the storage vessel and the EFR. Otherwise, use facility records to determine that the seal was in contact with the liquid between the wall of the storage vessel and the EFR the last time the facility inspected it.</p>	
b. Secondary Seal	<p>Observe from the platform that the seal is continuous and completely covers the space between the EFR and the vessel wall. Note on the tank roof drawing, provided with this checklist, where any gaps, tears, or holes are seen.</p> <p>Determine from facility records that a secondary seal is installed above the primary seal or if the secondary seal is pulled back, observe that there is a primary seal below the secondary seal.</p> <p>Determine that the gaps between the wall and seal do not exceed 21.2 cm² per meter (1.0 in² per foot) of vessel diameter and the gap widths do not exceed 1.3 cm (0.5 in.). This can be done by measuring the gaps in the seals with dowels of various diameters while wearing proper respiratory protection or by consulting facility records. Measurements should be recorded for at least four locations around the tank.</p> <p>Look for any corrosion, holes, tears, or other openings in the shoe, flexible seal fabric, or seal envelope.</p>	

**VISUAL INSPECTION CHECKLIST FOR
EXTERNAL FLOATING ROOF STORAGE TANK [S265.1085(f)]**

Equipment	Visual Inspection Procedures	Field Observations
3. Automatic Bleeder Vents	<p>Observe from the platform that the vents are closed during normal operations (exemptions for emptying or refilling).</p> <p>If possible, observe a tank filling operation. While floating the roof off the leg supports, observe whether the automatic bleeder vents open. (Vents may be open only when the roof is being floated off the tank bottom during filling or when the roof is supported on the legs during draining operation.)</p>	
4. Rim Space Vents	<p>Visually determine if the rim space vents are closed during normal operation (exceptions during emptying or refilling).</p> <p>If possible, observe whether the rim space vents are open when the roof is being floated off the leg supports. (Rim space vents may be open only when the roof is being floated off or landing on the roof leg supports during filling or draining operations).</p>	
5. Emergency Roof Drain	<p>Observe from the platform if the emergency roof drain is covered with a slotted membrane fabric. Does the fabric cover at least 90 percent of the opening? Were actual measurements or visual estimations used for this determination?</p>	

**VISUAL INSPECTION CHECKLIST FOR
EXTERNAL FLOATING ROOF STORAGE TANK [S265.1085(f)]**

Equipment	Visual Inspection Procedures	Field Observations
6. Deck Openings	<p>Confirm by visual inspection that each opening in the external floating roof deck is equipped with a gasketed cover, seal or lid. Without opening the lid or cover, visually inspect the visible portion of any seal or gaskets. Does the seal or gasket appear worn, torn, shredded, ripped, or otherwise misaligned to prevent forming a vapor-tight seal?</p> <p>Are all deck openings closed? (The only exception is when the device is in actual use.)</p>	

**VISUAL INSPECTION CHECKLIST FOR
INTERNAL FLOATING ROOF STORAGE TANK [§265.1085(e)]**

Equipment	Visual Inspection Procedures	Field Observations
1. Internal Floating Roof (IFR)	<p>The inspector should be advised of the hazards of inspecting an internal floating roof tank that contains hazardous waste. The inspector should never enter the tank to inspect the IFR without first consulting proper EPA documentation such as "Confined Space Safety Document for Conducting NESHAP Compliance Inspections of Benzene Storage Tanks (EPA 455/R-92-003)." An inspector should never go into a confined space without another inspector who has also been trained to enter confined spaces.</p> <p>Confirm that the IFR is floating on the liquid surface (except when empty or during initial fill) by comparing the liquid level with the roof level. The operator can supply this information.</p> <p>Inspect the periphery of the tank for possible leaks in the shell, valves, flanges and pumps.</p> <p>Inspect the periphery of the tank for corrosion.</p>	

**VISUAL INSPECTION CHECKLIST FOR
INTERNAL FLOATING ROOF STORAGE TANK [§265.1085(e)]**

Equipment	Visual Inspection Procedures	Field Observations
2. Deck Openings	<p>While using proper respiratory protection, observe without entering the IFR, if all sample well penetrations into the IFR have a slit fabric cover. Is 90 percent of the opening covered? Were actual measurements or visual estimates used for this determination?</p> <p>Visually verify if the ladder passage through the deck has a gasketed sliding cover. Is the cover closed? Does it seal without any visible gaps?</p> <p>Visually inspect the fixed roof column. Is there a flexible fabric sleeve or a gasketed sliding cover provided on the deck at the point of column entrance? Is the fabric sleeve free from holes, tears or gaps?</p> <p>Does the gasketed cover seal without any visible gaps?</p>	

**VISUAL INSPECTION CHECKLIST FOR
INTERNAL FLOATING ROOF STORAGE TANK [S265.1085(e)]**

Equipment	Visual Inspection Procedures	Field Observations
3. Closure device	<p>Visually determine that a continuous closure device is installed to fill the gap between the edge of the IFR and the vessel wall. This should not be attempted if there is an accumulation of excessive vapors or if the inspector is not using a self-contained air supply before opening the roof hatch. Look for signs of seal deterioration. The seals can be observed through roof hatches with the use of a non-sparking flashlight.</p> <p>Is the closure device either a foam or liquid seal, two seals or a metallic shoe seal?</p> <p>Identify any corrosion, holes, tears or other openings in the shoe, flexible seal fabric, or seal envelope. Indicate their positions and measurements on the tank floating roof drawing provided with this checklist.</p>	
4. Automatic Bleeder Vents	<p>Are the vents closed? (Exceptions allowed during emptying and refilling procedures only.)</p> <p>Are vents gasketed?</p>	
5. Rim Space Vents	<p>Are the vents closed? (Exceptions allowed during emptying and refilling procedures or at other times when set at the manufacturers recommended setting to release pressure buildup.)</p> <p>Are vents gasketed? Are gaskets in good condition?</p>	

**VISUAL INSPECTION CHECKLIST FOR
INTERNAL FLOATING ROOF STORAGE TANK [§265.1085(e)]**

Equipment	Visual Inspection Procedures	Field Observations
6. Covers and Lids	<p>While using a proper self-contained breathing apparatus, determine visually that each opening in the IFR is closed and equipped with a cover or lid. (Exceptions for leg sleeves, automatic bleeder vents, rim space vents, column supports, ladder passages, sampling wells, and stub drains must meet their respective closure requirements.) There should be no visible gaps.</p> <p>While using a proper self-contained breathing apparatus, visually determine through hatch that all openings in the IFR are closed (except when a device is in actual use). Are covers on access hatch and automatic gauge float well closed and bolted unless in use?</p>	

**VISUAL INSPECTION CHECKLIST FOR
CONTAINERS [§265.1087]**

Equipment	Visual Inspection Procedures	Field Observations
1. General	What is the design capacity if the container	<i>Do not meet DOT stds</i>
	Is the hazardous waste managed in the container a "light material" as defined in the rule (265.1081)?	<i>No Containers</i>
	Is the container used for a waste stabilization process?	
	Is the container required to meet Container Level 1, 2, or 3 standards?	
	Does the container meet applicable U.S. Department of Transportation Regulations?	
	Do the containers exhibit any signs of corrosion?	
	Is there a pressure gauge? What is the pressure reading?	
2. Level 1	If Level 1, what Level 1 alternative does the container meet:	
	<ul style="list-style-type: none"> • DOT • Cover and closure device • Organic vapor-suppressing barrier 	
3. Level 2	If Level 2, what Level 2 alternative does the container meet:	
	<ul style="list-style-type: none"> • DOT • No detectable emissions • Vapor tight 	
4. Level 3	If Level 3, what Level 3 alternative does the container meet:	
	<ul style="list-style-type: none"> • Enclosure vented to control device • Vented directly to control device 	
	Is the enclosure designed/operated to meet criteria for a permanent total enclosure (40 CFR 52.741)	

**VISUAL INSPECTION CHECKLIST FOR
CONTAINERS [S265.1087]**

Equipment	Visual Inspection Procedures	Field Observations
Treatment of Containerized Waste (waste stabilization)	Confirm that opening container for treatment purposes is performed under a cover or enclosure equipped with a closed vent system routing all vented container vapors to a control device, or the container itself is vented directly through a closed vent system to a control device.	
5. Cover, Lids and Openings	Observe that the container covers and all openings including bungs, hatches and sampling ports are closed.	
6. Seals, Gaskets and Latches	Observe that each opening on the container is sealed in the closed position with a gasket and latch except during waste loading, removal, inspection or sampling.	

**VISUAL INSPECTION CHECKLIST FOR
SURFACE IMPOUNDMENTS [§265.1086]**

Equipment	Visual Inspection Procedures	Field Observations
1. General	<p>Observe if the surface impoundment has a cover. Is it a fixed cover such as an air supported structure or floating membrane cover?</p> <p>Observe that there is a closed-vent system routing vented emissions to a control device for fixed covers.</p> <p>Is there a pressure gauge? What is the pressure reading?</p>	N/A
2. Cover and All Openings	<p>Visually inspect cover and openings such as access hatches, sampling ports, and gauge wells. They should be covered completely and free from gaps, tears or holes. Does the cover form a continuous barrier over the entire surface area of the liquid?</p> <p>Is each opening closed and in the sealed position (covered by a lid that is gasketed and latched) unless sampling, removal or equipment inspection, maintenance or repair is occurring?</p> <p>Is the cover in place during waste storage?</p> <p>If a floating membrane cover, is the cover floating on the liquid surface?</p> <p>What are the cover materials of construction? If a FMC fabricated of HDPE, what is the thickness of the HDPE, >2.5 mm?</p>	

**VISUAL INSPECTION CHECKLIST FOR
SURFACE IMPOUNDMENTS [§265.1086]**

Equipment	Visual Inspection Procedures	Field Observations
3. Closed-vent System and Control Device	Visually inspect the enclosure for leaks. Is each cover seal, access hatch or other openings free from cracks or gaps, closed and properly sealed and gasketed?	
4. Transfer	How is the hazardous waste transferred to and from the surface impoundment? Are the units that precede or follow the surface impoundment subject to Subpart CC controls?	

**VISUAL INSPECTION CHECKLIST FOR
INDIVIDUAL DRAIN SYSTEMS**

Equipment	Visual Inspection Procedures	Field Observations
1. General	<p>Visually confirm individual drain system openings are covered and a closed vent system is in place to route collected vapors to a control device.</p> <p>Is there a pressure gauge? What is the pressure reading?</p>	N/A
2. Covers, Seals and Gaskets	<p>Visually check all openings for covers. Are covers maintained in the closed and sealed position at all times except when the opening is used for waste sampling, removal, inspection, maintenance or repair?</p> <p>Visually inspect seals for cracks or gaps.</p> <p>Determine visually whether access hatches and other openings have been gasketed properly. Are gaskets in good condition?</p> <p>Is drain system operating under vacuum? If so locate pressure indicator and record pressure.</p>	
3. Alternative for Individual Drain Systems	<p>If individual drain systems are not covered and equipped with closed-vent systems and control devices they must comply with alternative requirements.</p>	
a. Drains	<p>Is each drain equipped with water seal controls or a tightly sealed cap or plug?</p> <p>Is adequate water level maintained in water seal?</p>	

**VISUAL INSPECTION CHECKLIST FOR
INDIVIDUAL DRAIN SYSTEMS**

Equipment	Visual Inspection Procedures	Field Observations
b. Junction Box Covers	<p>Visually confirm each junction box is equipped with a cover.</p> <p>Visually confirm the presence of a seal around the perimeter of the junction box cover. Is the seal free from cracks or gaps?</p> <p>Is the junction box cover in place except during inspection and maintenance?</p>	
c. Vent Pipe	<p>If water seal controls are used to prevent vapor emissions from junction box, is an adequate water level maintained?</p> <p>Confirm that each vent pipe is at least 90 cm (3 feet) in length and 10.2 cm (4 inches) or less in diameter.</p> <p>Confirm presence of a flow indicator on vent pipes and a system to prevent discharge of organic vapor during normal operation or vent pipe must be connected to a closed-vent connected to a control device.</p> <p>Is flow indicator on the vent pipe showing flow from the junction box?</p>	
d. Sewer Lines	<p>Visually check sewer lines for covers or enclosure preventing atmospheric emissions.</p> <p>Check joints, seals, and all interfaces to determine if cover or enclosure is free from cracks or gaps.</p> <p>Visually inspect unburied portion of sewer line for broken seals, cracks or gaps.</p>	

**VISUAL INSPECTION CHECKLIST FOR
CONTROL DEVICES [S265.1088]**

Equipment	Visual Inspection Procedures	Field Observations
1. General	<p>Verify that there is a control device associated with the <u>waste</u> management unit. What type of control device is used?</p> <p>Confirm control device is operating when waste is placed in the waste management unit vented to the control device.</p> <p>Is there a bypass line that could divert the vent steam for the control device? Is it secured in a closed position or is there a flow monitor at the bypass entrance?</p>	<p><i>NO Waste Mgmt units</i></p>
2. Incinerator	<p>Confirm presence and operation of a temperature monitoring device equipped with a continuous recorder.</p> <p>Observe that the temperature sensor is installed at a representative location in the combustion chamber.</p>	<p><i>N/A</i></p>
a. Thermal vapor Incinerator		
b. Catalytic Vapor Incinerator	<p>Confirm presence and operation of a temperature monitoring device equipped with a continuous recorder.</p> <p>Observe that the two temperature monitoring devices are located in the gas stream before and after the catalyst bed and not in the firebox. The inspector may be able to confirm this by locating the monitoring recorder and tracing leads to sensors.</p>	

**VISUAL INSPECTION CHECKLIST FOR
CONTROL DEVICES [S265.1088]**

Equipment	Visual Inspection Procedures	Field Observations
3. Flares	<p>Is the flare equipped with a monitoring device, such as a thermocouple, to detect flame presence?</p> <p>Is the flare steam, air or nonassisted?</p> <p>Observe that there is a flame at all times when emissions are vented to the flare.</p> <p>Does the flare emit visible emissions? Do visible emissions exceed the allowable limit (5 minutes per 2 hour period according to Method 22)?</p>	N/A
4. Boiler or Process Heater	<p>Confirm that there is a temperature monitoring device in the firebox.</p> <p>Is the temperature monitoring device equipped with a continuous recorder?</p> <p>Is the recorder operational?</p>	Y
a. Less than 44 Megawatts		Y
b. 44 Megawatts or Greater	<p>Confirm that there is a monitoring device equipped with a continuous recorder. What parameter(s) are monitored?</p>	Y
5. Condenser	<p>Observe presence and operation of either:</p> <p>1) Monitoring device and continuous recorder to measure the concentration level of the organic compounds in the exhaust vent stream from the condenser or,</p> <p>2) A temperature monitoring device with continuous recorder monitoring temperature in the exhaust stream from the condenser.</p>	N/A

**VISUAL INSPECTION CHECKLIST FOR
CONTROL DEVICES [S265.1088]**

Equipment	Visual Inspection Procedures	Field Observations
6. Carbon Adsorption		
a. Regenerative Carbon Adsorption System	<p>Is a monitoring device present that indicates the outlet gas stream concentration of organic compounds from each bed to track breakthrough or measures a parameter that indicates the carbon bed is regenerated on a regular time cycle?</p> <p>Is the monitoring device equipped with a continuous recorder? Is the device working properly?</p> <p>Is the fan operating?</p> <p>Observe if there is any visible corrosion on the shell of the adsorber or in the ductwork.</p>	N/A
b. Non-Regenerative Carbon Adsorption System	<p>Visually check for documentation that breakthrough monitoring is being conducted and that carbon has been changed (i.e., a schedule posted with the last carbon replacement indicated).</p> <p>Observe if there is any visible corrosion on the shell of the adsorber or in the ductwork.</p>	N/A

**RECORDS INSPECTION CHECKLIST FOR
FIXED ROOF STORAGE TANKS WITH A CLOSED VENT SYSTEM
AND CONTROL DEVICE [S265.1090]**

Equipment	Record Inspection Procedures	Observations
1. Closed Vent System	<p>Review facility records. Have facility records been kept for three years? Are annual leak detection measurements conducted on the closed vent system? Note cases where leak detection measurements exceeded 500 ppm above background levels except during routine maintenance.</p> <p>Is there documentation that these leaks have been repaired? Are leaks repaired as soon as practicable, but not later than 45 days. If repair is delayed, was it justified?</p>	N/A
2. Control Devices	<p>Are monitoring records being kept for the control device? Compare facility results with field inspection notes.</p> <p>Does the control device reduce inlet organic emissions by 95 percent or greater? Indicate control device efficiency and calculations.</p> <p>Check records to determine if control device was out of compliance during periods of planned routine maintenance for more than 240 hours per year. If out of compliance, document record findings.</p> <p>Are semi-annual reports filed? Do the reports indicate each occurrence that resulted in excess emissions?</p> <p>Verify that the facility has a record of the measured values of the monitored parameters for the control device. Check field notes to verify that the same parameters are being monitored.</p>	

**RECORDS INSPECTION CHECKLIST FOR
FIXED ROOF STORAGE TANKS WITH A CLOSED VENT SYSTEM
AND CONTROL DEVICE [S265.1090]**

Equipment	Record Inspection Procedures	Observations
	Does the facility keep maintenance records for the control device? Does the facility keep records for the control device when the facility is experiencing malfunctions or upset conditions and their effects on the control device? Do the records include the following: duration of noncompliance periods due to maintenance or malfunctions, dates and times of noncompliance periods at the beginning and conclusion of maintenance or malfunctions?	

**RECORDS INSPECTION CHECKLIST FOR
EXTERNAL FLOATING ROOF STORAGE TANK**

Equipment	Record Inspection Procedures	Observation
1. External Floating Roof	Determine that the facility is fulfilling record keeping requirements. Tank inspections, maintenance and other monitoring information is to be kept on file for two years. Compare facility records of tank seal gap measurements with those contained in annual reports. Note any discrepancies in seal gap measurements. Are records complete for both primary and secondary seal gap measurements?	
2. Closure Device a. Primary Seal	<p>Check records to verify that the seal is either a metallic shoe seal or a liquid-mounted seal (in contact with the liquid). check records to verify that the seal is continuous.</p> <p>Using facility measurements from the latest inspection, note date of last inspection and how frequently inspections are being conducted. Determine if seal gaps exceed 212 cm² per meter (10.0 in.² per foot) and if the width of any gap exceeds 3.81 cm (1.5 in.). Were facility gap measurements taken at four locations along the roof? Do facility inspection measurements agree with field inspection results? Note discrepancies.</p>	

**RECORDS INSPECTION CHECKLIST FOR
EXTERNAL FLOATING ROOF STORAGE TANK**

Equipment	Record Inspection Procedures	Observation
i.Metallic Shoe	<p>For metallic shoe seal, check facility records to verify that the flexible coated fabric spans the entire space between the metal seal and the vessel wall.</p> <p>Determine that one end of the metallic shoe seal extends into the stored liquid and the other extends a minimum vertical distance of 61 cm (24 inches) above the liquid surface. Facility records should indicate the dimensions of the metallic shoe seal.</p>	
ii.Liquid-Mounted	<p>Determine from records if liquid mounted seal was in contact with the liquid at the time of the last facility inspection.</p> <p>Determine from records if the seal is either a liquid-filled or a foam-filled seal.</p>	
b.Secondary Seal	<p>Determine from facility records whether a secondary seal is installed above the primary seal.</p> <p>Use facility inspection records to determine if gaps exceed 21.3 cm² per meter (1.0 in² per foot) and the width of any gap exceeds 1.27 cm (0.5 in.). Do facility inspection measurements agree with field inspection results? Note any discrepancies.</p>	

**RECORDS INSPECTION CHECKLIST FOR
INTERNAL FLOATING ROOF STORAGE TANKS**

Equipment	Record Inspection Procedures	Observation
1. Internal Floating Roof (IFR)	<p>Determine if facility design records were followed for installment. If not, request supporting information. Use facility design records to determine the following information:</p> <p>Are all sampling well penetrations into the IFR equipped with a slit fabric cover that covers 90 percent of the opening?</p> <p>Are ladder passages equipped with a gasketed sliding cover?</p> <p>Are column support penetrations equipped with a flexible fabric sleeve or a gasketed sliding cover?</p>	
2. Closure Device	<p>Do any facility records indicate a closure device is present on the IFR? Do inspection records indicate the closure device is continuous?</p> <p>Compare any visual inspection data recorded on the attached tank floating roof drawing with facility inspection record data. Compare facility gap measurements with identified seal gaps.</p> <p>Are facility calculations correct or are any gaps exceeding the width or length proportions?</p> <p>What type of seal is used (foam or liquid seal, two seal or metallic shoe seal)?</p>	
a. Foam or Liquid Seal	Do inspection records show the seal is installed in contact with the liquid (liquid-mounted)?	

**RECORDS INSPECTION CHECKLIST FOR
INTERNAL FLOATING ROOF STORAGE TANKS**

Equipment	Record Inspection Procedures	Observation
b. Two Seals	Do design and inspection records show there are two seals, one above the other?	
c. Metallic Shoe Seal	Do records show that seal was designed and still operates with a flexible coated fabric spanning the entire annular space between the metal shoe and the edge of the IFR? When was the seal last inspected? How frequently are inspections being conducted?	
3. Automatic Bleeder Vents	Verify through record inspection that the vents are gasketed.	
4. Rim Space Vents	Verify through record inspection that the vents are gasketed.	
5. Well Penetrations	Does each penetration (except vents) in a non-contact IFR project below the liquid surface?	
6. Covers and Lids	Check the design records to determine if all penetrations through the roof have a cover or lid and a gasket? (Leg sleeves, automatic bleeder vents, rim space vents, column wells, ladder wells, sample wells, and stub drains must comply with their individual closure requirements as previously mentioned). Check if covers for access hatches and automatic gauge float wells are bolted.	

RECORDS INSPECTION CHECKLIST FOR CONTAINERS

Equipment	Record Inspection Procedures	Observations
1. Record-keeping Requirements	<p>Locate and obtain records. Check records for completeness.</p> <p>Check visual inspection records for container covers and openings for container requiring inspections.</p> <p>For identified defects (broken seal, gasket or other problem), was method and date of repair recorded?</p> <p>Was repair effort attempted as soon as practical but not more than 15 calendar days after detection? If repair was delayed, was it justified?</p> <p>For Level containers >0.46 m³ (119 gallons) and NOT in light material service, check records for light material service determinations</p>	<p><i>No Containers</i></p>
2. Leak Detection Inspection	<p>Check records of any leak detection inspection (Method 21) for covers and openings including bungs, hatches, and sampling ports that the owner/operator may have conducted for Level 2 containers. Was emission level and inspection date recorded?</p> <p>Check records of any Method 27 tests conducted for Level 2 containers. Were tests conducted within past 12 months</p>	

**RECORDS INSPECTION CHECKLIST FOR
CONTAINERS**

Equipment	Record Inspection Procedures	Observations
a.Covers and All Openings	<p>Do records show visual leak inspections performed within 24 hours of receipt and thereafter at least once per year?</p> <p>For identified leaks, was repair attempted as soon as practical but no later than 15 calendar days after detection? If repair was delayed, was it justified?</p>	
b.Closed Vent System or Treatment Covers	<p>Check records to confirm if closed vent system including all openings, door hatches, ductwork, and connections operated with no detectable emissions (i.e., less than 500 ppmv above background). Records should indicate initial and annual leak detection testing results.</p> <p>For identified leaks (above 500 ppmv above background), was repair attempted as soon as practical but not later than 45 calendar days after detection? If repair was delayed, was it justified?</p>	
c.Control devices	<p>Check records to confirm the control device destroys or recovers vented emissions to performance levels required by Subpart CC, e.g., by 95 weight percent or greater.</p> <p>Determine through examination of records that the control device was operational during period when receiving container vented emissions for those containers that must meet Level 3 controls.</p>	

**RECORDS INSPECTION CHECKLIST FOR
CONTAINERS**

Equipment	Record Inspection Procedures	Observations
d. Enclosures	Check records of design documentation that enclosures used for Level 3 containers meet the criteria specified in 40 CFR 52.741, appendix B for permanent total enclosures.	

**RECORDS INSPECTION CHECKLIST FOR
SURFACE IMPOUNDMENTS**

Equipment	Record Inspection Procedures	Observation
1. Annual Inspection	Check records to verify compliance with annual emissions limits for the fixed roof cover and all openings.	N/A
2. Visual Inspection	Verify visual inspection results and test date. Is visual inspection conducted on an annual basis? When broken seals, cracked gaskets or other problems are identified in the visual inspection was the first repair effort made within 15 calendar days? If repair was delayed, was it justified?	N/A

**RECORDS INSPECTION CHECKLIST FOR
CONTROL DEVICES**

Equipment	Record Inspection Procedures	Observations
1. General	<p>Review facility records. Are quarterly visual inspections of the control device and closed-vent system conducted?</p> <p>Do records contain a statement by the owner/operator certifying that the closed vent system on control device is designed to operate at the documented performance level when the waste management unit vented to the control device is or would be operating at the highest load or capacity.</p> <p>If engineering calculations are used to determine performance then does the design analysis include specification, drawings, schematics, and piping and instrumentation diagrams that describe the control device based on acceptable engineering texts?</p> <p>For identified visible defects such as holes in ductwork or piping and loose connections, do the repair records show that the first effort to repair was made within 5 days and repairs were completed within 15 calendar days? If repair was delayed, was it justified?</p> <p>Are annual leak detection measurements conducted on the closed-vent system?</p> <p>Note cases where leak detection measurements exceeded 500 ppmv above background levels.</p>	<p><i>No closed Vent systems</i></p>

**RECORDS INSPECTION CHECKLIST FOR
CONTROL DEVICES**

Equipment	Record Inspection Procedures	Observations
	Is there documentation that these leaks were repaired? Note any discrepancies.	
	Check daily operating data from monitoring equipment (e.g., temperature monitors or flow indicators) to confirm control device is operating properly. Record data.	
2. Control Device (Incinerator, <u>Boiler or Process Heater</u>)	Determine from record examination (engineering calculation or performance test) that the control device meets one of the following: a) Reduce organic emissions vented to it by 95 weight percent or greater; b) Achieves a total organic compound concentration of 20 ppmv on a dry basis correct to 3 percent oxygen; or c) Provide a minimum residence time of 0.5 seconds at a minimum temperature of 760°C.	<i>No records available</i>
3. Vapor Recovery System (Carbon Adsorption or Condenser)	Determine from record examination that carbon adsorption system recovers organic emissions vented to it with an efficiency of 95 weight percent or greater. Demonstration of appropriate conditions may be by: 1) engineering calculations, or 2) performance tests.	<i>N/A</i>
a. Non-Regenerative Carbon Adsorber	Verify carbon is replaced according to scheduled replacement intervals? Note the schedule replacement intervals	<i>N/A</i>

**RECORDS INSPECTION CHECKLIST FOR
CONTROL DEVICES**

Equipment	Record Inspection Procedures	Observations
4. Flares	<p>Check records for periods when flare operated with visible emissions. Note all violations of visible flare emission exceeding 5 minutes during any 2 consecutive hours.</p> <p>Check that records are kept for any periods of pilot flame absence during the loading cycle.</p> <p>Determine the net heat value of the fuel.</p>	N/A

**RECORDS INSPECTION CHECKLIST FOR
SEMI-ANNUAL REPORTS**

Equipment	Record Inspection Procedures	Observations
1. For a control device:		
Thermal vapor incinerator	Each 3-hour period of operation during which the average temperature of the gas stream in the combustion zone is more than 28° C below the design combustion zone temperature.	N/A
Catalytic vapor incinerator	Each 3-hour period of operation during which the average temperature of the gas stream immediately before the catalyst bed is more than 28° C below the design gas stream temperature, and any 3-hour period during which the average temperature difference across the catalyst bed (i.e., the difference between the temperatures of the gas stream immediately before and after the catalyst bed), is less than 80 percent of the design temperature difference.	N/A
Boiler or process heater	Each 3-hour period of operation during which the average temperature of the gas stream in the combustion zone having a design heat input capacity less than 44 MW is more than 28° C below the design combustion zone temperature.	NO records available
Carbon absorber, condenser, or other vapor recovery system	Each 3-hour period of operation during which the average concentration of organics or the average concentration of benzene in the exhaust gases is more than 20 percent greater than the design concentration level of organics or benzene in the exhaust gas.	N/A

**RECORDS INSPECTION CHECKLIST FOR
SEMI-ANNUAL REPORTS**

Equipment	Record Inspection Procedures	Observations
Condenser	Each 3-hour period of operation during which the temperature of the exhaust vent stream is more than 6° C above the design average exhaust vent stream temperature, or the temperature of the coolant fluid exiting the condenser is more than 6° C above the design average coolant fluid temperature at the condenser outlet.	N/A
Flare	Each period in which the pilot flame is absent	N/A
Boiler or process heater	Each occurrence when there is a change in the location at which the vent stream is introduced into the flame zone.	No records available
Regenerable carbon adsorber system	Each occurrence when the carbon is not regenerated at the redetermined carbon bed regeneration time.	N/A
Non-regenerable carbon adsorber system	Each occurrence when the carbon is not replaced at the predetermined interval specified.	↓
Other control device	Each 3-hour period during which the parameters monitored are outside the range of values specified in the rule, or any other periods specified by the Administrator for a control device.	
Cover and closed-vent system monitored under Subpart CC	Any period in which the pressure in the waste management unit is equal to or greater than atmospheric pressure (emission control that is maintained at a pressure less than atmospheric pressure).	

GENERAL RECORD INSPECTION CHECKLIST

General information	Observations
Are records maintained that identify each waste stream at the facility subject to the Subpart CC control requirements? Do records indicate whether or not the waste stream is controlled for organic emissions? [§61.356(b)]	
Are the number of subject waste management units documented? Date of when controls were installed?	
For waste streams not controlled but subject to Subpart CC, do the records contain the following: test results, measurements, calculations, and other documentation used to determine waste stream identification, whether or not annual waste quantity, range of VO concentrations, annual average flow-weighted VO concentrations.	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY



REGION 5 CENTRAL REGIONAL LABORATORY

536 SOUTH CLARK STREET

CHICAGO, ILLINOIS 60605

Date: **JUL 15 1997**

Subject: Review of Region 5 Data for **CSC LTD**

From: Charles T. Elly, Director
Region 5 Central Regional Laboratory

A handwritten signature in cursive script, appearing to read "Chuck Elly".

To:

Attached are the results for **CSC LTD**

CRL request number: **970310**

Analyzed for: **VOA (Organics)**

Results are reported for sample designations: 97KR03S03, and -S04 (Two samples)

Results Status:

(X) Acceptable for Use except the compound data qualified UJ or J . Please see below.

(X) Data Qualified but acceptable for Use for the compound data qualified UJ or J.

() Data Unacceptable for Use.

Comments on Data Quality by Reviewer:

- Some of the target compounds did not meet the CRL QC requirements. The effected compound data were qualified UJ (estimated MDL) if not detected and J (estimated result) if detected. No other problems were observed.

Comments by Laboratory Director or Quality Control Coordinator

Review Record for CSC LTD

970310

VOA (Organics)

Babu Paduchuri 07/10/97

Task Monitor Date ☒ Reviewed ☐ Unreviewed

Chi Yang 7/13/97

Team Leader Date ☒ Reviewed ☐ Unreviewed

Chuck E. Elz 7/15/97

QC Coordinator (VACANT) Date ☐ Reviewed ☒ Unreviewed

Sylvia Griffin

JUL 15 1997

Data Management Coordinator and Date Received

Date Transmitted JUL 15 1997

Please sign and date this form below and return it with any comments to:

Sylvia Griffin
Data Management Coordinator
Region 5 Central Regional Laboratory
ML - 10C

Received by and Date

Comments:

AFB/01

DIVISION/BRANCH

WATON
WECAB

SAMPLING DATE

6/25/97

LAB ARRIVAL DATE

6/26/97

DUE DATE

7/17/97

DU NUMBER

AFLE

DATASET NUMBER

970310

STUDY CSC LTD

PRIORITY 2

CONTRACTOR

PRC

[illegible]

5-027
630
5-023
718

-1A -
VOLATILE ORGANICS ANALYSIS DATA SHEET

EPA SAMPLE NO.

LAB BLANK

Lab Name: CSC LTD

AFE Contract: CRL

Lab Code: ML-10C Case No.: 970310 SAS No.: CSCLTD SDG No.: -----

Matrix: (soil/water) SOIL

Lab Sample ID: LAB BLANK

Sample wt/vol: 5 (g/ml) G

Lab File ID: >P0027

Level: (low/med) LOW

Date Received: 06/26/97

% Moisture: not dec. ----

Date Analyzed: 07/03/97

Column: (pack/cap) CAP

Dilution Factor: 1.0

CONCENTRATION UNITS:

CAS NO. COMPOUND (ug/L or ug/Kg) ug/Kg Q

74-87-3	Chloromethane	10	U
75-01-4	Vinyl chloride	10	U
74-83-9	Bromomethane	10	UJ
75-00-3	Chloroethane	10	UJ
107-64-1	Acrolein	20	U
75-35-4	1,1-Dichloroethene	5	UJ
67-64-1	Acetone	20	UJ
75-15-0	Carbon disulfide	5	U
75-09-2	Methylene chloride	5	U
75-35-4	trans-1,2-Dichloroethene	5	U
107-13-1	Acrylonitrile	10	U
75-34-3	1,1-Dichloroethane	5	U
594-20-7	2,2-Dichloropropane	5	U
540-59-0	cis-1,2-Dichloroethene	5	U
78-93-3	2-Butanone	20	U
74-97-5	Bromochloromethane	5	U
67-66-2	Chloroform	5	U
71-55-6	1,1,1-Trichloroethane	5	U
56-23-5	Carbon tetrachloride	5	U
563-58-6	1,1-Dichloropropene	5	U
71-43-2	Benzene	5	U
107-06-2	1,2-Dichloroethane	5	U
79-01-9	Trichloroethene	5	U
73-87-8	1,2-Dichloropropane	5	U
74-95-3	Dibromomethane	5	U
110-75-3	2-Chloroethyl vinylether	10	UJ
75-27-4	Bromodichloromethane	5	U
10061015	cis-1,3-Dichloropropene	5	U
108-88-3	Toluene	5	U
108-10-1	4-Methyl-2-pentanone	10	U
10061026	trans-1,3-Dichloropropene	5	U
127-18-4	Tetrachloroethene	5	U
79-00-3	1,1,2-Trichloroethane	5	U
142-28-9	1,3-Dichloropropane	5	U

NO TICS.

FORM I VOA

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.1A-2
VOLATILE ORGANICS ANALYSIS DATA SHEET

EPA SAMPLE NO.

LAB BLANK

Name: CSC LTD

AFE Contract: CRL

Lab Code: ML-10C Case No.: 970310 SAS No.: CSCLTD SDG No.: -----

Matrix: (soil/water) SOIL

Lab Sample ID: LAB BLANK

Sample wt/vol: 5 (g/ml) G

Lab File ID: >P0027

Level: (low/med) LOW

Date Received: 06/26/97

Moisture: not dec. ----

Date Analyzed: 07/03/97

Column: (pack/cap) CAP

Dilution Factor: 1.0

CAS NO.	COMPOUND	CONCENTRATION UNITS: (ug/L or ug/Kg) ug/Kg	Q
---------	----------	---	---

591-78-6	2-Hexanone	10	UX
124-48-1	Dibromochloromethane	5	U
106-93-4	1,2-Dibromoethane	5	U
108-90-7	Chlorobenzene	5	U
630-20-6	1,1,1,2-Tetrachloroethane	5	U
100-41-4	Ethylbenzene	5	U
108-38-3	m &/or p-Xylene	5	U
95-47-6	o-Xylene	5	U
100-42-5	Styrene	5	U
75-25-2	Bromoform	5	U
98-82-8	Isopropylbenzene	5	U
108-86-1	Bromobenzene	5	U
96-18-4	1,2,3-Trichloropropane	5	U
79-34-5	1,1,2,2-Tetrachloroethane	5	U
103-65-1	n-Propylbenzene	5	U
95-49-8	2-Chlorotoluene	5	U
106-43-4	4-Chlorotoluene	5	U
108-67-8	1,3,5-Trimethylbenzene	5	U
98-06-6	tert-Butylbenzene	5	U
95-63-6	1,2,4-Trimethylbenzene	5	U
135-98-3	sec-Butylbenzene	5	U
541-73-1	1,3-Dichlorobenzene	5	U
106-46-7	1,4-Dichlorobenzene	5	U
99-87-6	p-Isopropyltoluene	5	U
95-50-1	1,2-Dichlorobenzene	5	U
104-51-8	n-Butylbenzene	5	U
96-12-8	1,2-Dibromo-3-chloropropane	5	U
120-82-1	1,2,4-Trichlorobenzene	5	U
91-20-3	Naphthalene	5	U
87-68-3	Hexachlorobutadiene	5	U
87-61-6	1,2,3-Trichlorobenzene	5	U

7/10/97

VOLATILE ORGANICS ANALYSIS DATA SHEET

97KR03S03

Site Name: CSC LTD

AFE Contract: CRL

Lab Code: ML-10C Case No.: 970310 SAS No.: CSCLTD SDG No.: -----

Matrix: (soil/water) SOIL

Lab Sample ID: 97KR03S03

Sample wt/vol: 2.34 (g/mL) G

Lab File ID: >P0029

Level: (low/med) LOW

Date Received: 06/26/97

% Moisture: not dec.-----

Date Analyzed: 7/03/97

Column: (pack/cap) CAP

Dilution Factor: 1.0

CONCENTRATION UNITS:

CAS NO. COMPOUND (ug/L or ug/Kg) ug/Kg Q

74-87-3-----	Chloromethane	37.	U
75-01-4-----	Vinyl chloride	37.	U
74-83-9-----	Bromomethane	37.	UJ
75-00-3-----	Chloroethane	37.	UJ
107-64-1-----	Acrolein	74.	U
75-35-4-----	1,1-Dichloroethene	18.	UJ
67-64-1-----	Acetone	650.	J
75-15-0-----	Carbon disulfide	52.	
75-09-2-----	Methylene chloride	18.	U
156-60-5-----	trans-1,2-Dichloroethene	18.	U
107-13-1-----	Acrylonitrile	37.	U
75-34-3-----	1,1-Dichloroethane	18.	U
594-20-7-----	2,2-Dichloropropane	18.	U
156-59-2-----	cis-1,2-Dichloroethene	18.	U
78-93-3-----	2-Butanone	110.	
74-97-5-----	Bromochloromethane	18.	U
67-66-3-----	Chloroform	18.	U
71-55-6-----	1,1,1-trichloroethane	18.	U
56-23-5-----	Carbon tetrachloride	18.	U
563-53-6-----	1,1-Dichloropropene	18.	U
71-43-2-----	Benzene	18.	U
107-06-2-----	1,2-Dichloroethane	18.	U
79-01-6-----	Trichloroethene	18.	U
78-87-5-----	1,2-Dichloropropane	18.	U
74-95-3-----	Dibromomethane	18.	U
110-75-8-----	2-Chloroethyl vinyl ether	37.	UJ
75-27-4-----	Bromodichloromethane	18.	U
10061-01-5-----	cis-1,3-dichloropropene	18.	U
108-88-3-----	Toluene	10.	J
108-10-1-----	4-Methyl-2-pentanone	24.	J
10061-02-6-----	trans-1,3-Dichloropropene	18.	U
127-18-4-----	Tetrachloroethene	18.	U
72-00-5-----	1,1,2-Trichloroethane	18.	U
142-23-1-----	1,3-Dichloropropane	18.	U
591-73-6-----	2-Hexanone	37.	U
124-43-1-----	Dibromochloromethane	18.	U
106-93-2-----	1,2-Dibromoethane	18.	U

Are there any TICs ? (Please check a box)

YES ☒ NO ☐

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VOLATILE ORGANICS ANALYSIS DATA SHEET

97KR03S03

Sample Name: CSC LTD

AFE Contract: CRL

Lab Code: ML-10C Case No.: 970310 SAS No.: CSCLTD SDG No.: -----

Matrix: (soil/water) SOIL

Lab Sample ID: 97KR03S03

Sample wt/vol: 2.34 (g/mL) G

Lab File ID: >P0029

Level: (low/med) LOW

Date Received: 06/26/97

Moisture: not dec.-----

Date Analyzed: 7/03/97

Column: (pack/cap) CAP

Dilution Factor: 1.0

CONCENTRATION UNITS:

CAS NO. COMPOUND (ug/L or ug/Kg) ug/Kg Q

108-90-7-----	Chlorobenzene	18.	U
630-20-6-----	1,1,1,2-Tetrachloroethane	18.	U
100-41-4-----	Ethylbenzene	18.	U
1083836423-----	m &/or p-Xylene	18.	U
95-47-6-----	o-Xylene	18.	U
100-42-5-----	Styrene	18.	U
75-25-2-----	Bromoform	18.	U
98-82-8-----	Isopropylbenzene	18.	U
108-86-1-----	Bromobenzene	18.	U
96-18-4-----	1,2,3-Trichloropropane	18.	U
79-34-5-----	1,1,2,2-Tetrachloroethane	18.	U
103-65-1-----	n-Propylbenzene	18.	U
95-49-8-----	2-Chlorotoluene	18.	U
106-43-4-----	4-Chlorotoluene	18.	U
108-67-8-----	1,3,5-Trimethylbenzene	18.	U
98-06-6-----	tert-Butylbenzene	18.	U
95-63-6-----	1,2,4-Trimethylbenzene	18.	U
135-98-8-----	sec-Butylbenzene	18.	U
541-73-3-----	1,3-Dichlorobenzene	18.	U
106-46-7-----	1,4-Dichlorobenzene	18.	U
99-87-6-----	p-Isopropyltoluene	18.	U
95-50-1-----	1,2-Dichlorobenzene	18.	UJ
104-51-8-----	n-Butylbenzene	18.	UJ
96-12-8-----	1,2-Dibromo-3-chloropropane	18.	UJ
120-82-2-----	1,2,4-Trichlorobenzene	18.	UJ
91-20-3-----	Naphthalene	18.	UJ
87-68-3-----	Hexachlorobutadiene	18.	UJ
87-61-6-----	1,2,3-Trichlorobenzene	18.	UJ

FORM I-2 VOA

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Data Qualifiers: U = Compounds were analyzed but not detected. The value reported is the method detection limit for reagent water; J = Estimated; D=Diluted Sample; X = Result rejected for failing mass spectral confirmation; E = Concentration exceeded calibration range; B_ = Contaminant found in laboratory method blank.

1E
VOLATILE ORGANICS ANALYSIS DATA SHEET
TENTATIVELY IDENTIFIED COMPOUNDS

EPA SAMPLE NO.

97KR03S03

Lab Name: CSC LTD

AFE

Contract: CRL

Lab Code: ML-10C

Case No.: 970310

SAS No.: CSCLTD

SDG No.: -----

Matrix: (soil/water) SOIL

Lab Sample ID: 97KR03S03

Sample wt/vol: 2.34 (g/mL) G

Lab File ID: >P0029

Level: (low/med) LOW

Date Received: 06/26/97

% Moisture: not dec. ----

Date Analyzed: 7/03/97

Column: CAP

Dilution Factor: 1.00000

Number TICs found: 11

CONCENTRATION UNITS:
(ug/L or ug/Kg) ug/Kg

CAS NUMBER	COMPOUND NAME	RT	EST. CONC.	Q
1.	Unknown hydrocarbon	6.04	630.	J
2.	Unknown hydrocarbon	7.16	28.	J
3.	Unknown hydrocarbon	13.76	45.	J
4.	Unknown hydrocarbon	17.57	96.	J
5.	Unknown hydrocarbon	17.92	98.	J
6.	Unknown hydrocarbon	18.28	58.	J
7.	Unknown hydrocarbon	18.39	110.	J
8.	Unknown hydrocarbon	18.88	130.	J
9.	Unknown hydrocarbon	19.37	200.	J
10.	Unknown hydrocarbon	19.80	160.	J
11.	Unknown hydrocarbon	20.17	44.	J
12.				
13.				
14.				
15.				
16.				
17.				
18.				
19.				
20.				
21.				
22.				
23.				
24.				
25.				
26.				
27.				
28.				
29.				
30.				

VOLATILE ORGANICS ANALYSIS DATA SHEET

97KR03S04

Site Name: CSC LTD

AFE Contract: CRL

Lab Code: ML-100 Case No.: 970310 SAS No.: CSCLTD SDG No.: -----

Matrix: (soil/water) SOIL

Lab Sample ID: 97KR03S04

Sample wt/vol: 2.58 (g/mL) G

Lab File ID: >P0031

Level: (low/med) LOW

Date Received: 06/26/97

Moisture: not dec.----

Date Analyzed: 7/03/97

Column: (pack cap) CAP

Dilution Factor: 1.0

CONCENTRATION UNITS:

CAS NO. COMPOUND (ug/L or ug/Kg) ug/Kg Q

74-87-3-----	Chloromethane	19.	U
75-01-4-----	Vinyl chloride	19.	U
74-83-9-----	Bromomethane	19.	UJ
75-00-3-----	Chloroethane	19.	UJ
107-64-1-----	Acrolein	39.	U
75-35-4-----	1,1-Dichloroethene	10.	UJ
67-64-1-----	Acetone	31.	J
75-15-0-----	Carbon disulfide	10.	U
75-09-2-----	Methylene chloride	10.	U
156-60-5-----	trans-1,2-Dichloroethene	10.	U
107-13-1-----	Acrylonitrile	19.	U
75-34-3-----	1,1-Dichloroethane	10.	U
594-20-7-----	2,2-Dichloropropane	10.	U
156-59-2-----	cis-1,2-Dichloroethene	10.	U
78-93-3-----	2-Butanone	39.	U
74-97-5-----	Bromochloromethane	10.	U
67-66-3-----	Chloroform	10.	U
71-55-6-----	1,1,1-trichloroethane	10.	U
56-23-5-----	Carbon tetrachloride	10.	UJ
563-58-8-----	1,1-Dichloropropene	10.	U
71-43-2-----	Benzene	10.	U
107-06-2-----	1,2-Dichloroethane	10.	U
79-01-6-----	Trichloroethene	10.	U
78-87-5-----	1,2-Dichloropropane	10.	U
74-95-3-----	Dibromomethane	10.	U
110-75-3-----	2-Chloroethyl vinyl ether	19.	UJ
75-27-4-----	Bromodichloromethane	10.	UJ
10061-01-5-----	cis-1,3-dichloropropene	10.	UJ
108-88-2-----	Toluene	10.	U
108-10-7-----	4-Methyl-2-pentanone	19.	U
10061-00-6-----	trans-1,3-Dichloropropene	10.	UJ
107-18-1-----	Tetrachloroethene	10.	U
70-00-5-----	1,1,2-Trichloroethane	10.	U
112-28-1-----	1,3-Dichloropropane	10.	U
501-78-1-----	2-Hexanone	19.	U
124-48-1-----	Dibromochloromethane	10.	UJ
106-93-1-----	1,2-Dibromoethane	10.	U

Are there any TICs ? (Please check a box)

YES ☒ NO ☐

FORM I VOA

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VOLATILE ORGANICS ANALYSIS DATA SHEET

97KR03S04

Site Name: CSC LTD

AFE

Contract: CRL

Lab Code: ML-10C

Case No.: 970310

SAS No.: CSCLTD

SDG No.: -----

Matrix: (soil/water) SOIL

Lab Sample ID: 97KR03S04

Sample wt/vol: 2.58 (g/mL) G

Lab File ID: >P0031

Level: (low/med) LOW

Date Received: 06/26/97

% Moisture: not dec.----

Date Analyzed: 7/03/97

Column: (pack/cap) CAP

Dilution Factor: 1.0

CONCENTRATION UNITS:

CAS NO.

COMPOUND

(ug/L or ug/Kg) ug/Kg

Q

108-90-7-----	Chlorobenzene	10.	U
630-20-6-----	1,1,1,2-Tetrachloroethane	10.	U
100-41-4-----	Ethylbenzene	10.	U
1083836423-----	m &/or p-Xylene	10.	U
95-47-6-----	o-Xylene	10.	U
100-42-5-----	Styrene	10.	U
75-25-2-----	Bromoform	10.	UJ
98-82-8-----	Isopropylbenzene	10.	U
108-86-1-----	Bromobenzene	10.	U
96-18-4-----	1,2,3-Trichloropropane	10.	U
79-34-5-----	1,1,2,2-Tetrachloroethane	10.	U
103-65-1-----	n-Propylbenzene	10.	U
95-49-8-----	2-Chlorotoluene	10.	U
106-43-4-----	4-Chlorotoluene	10.	U
108-67-8-----	1,3,5-Trimethylbenzene	10.	U
98-06-6-----	tert-Butylbenzene	10.	U
95-63-6-----	1,2,4-Trimethylbenzene	10.	U
135-93-9-----	sec-Butylbenzene	10.	UJ
541-73-1-----	1,3-Dichlorobenzene	10.	U
106-46-7-----	1,4-Dichlorobenzene	10.	U
92-87-6-----	p-Isopropyltoluene	10.	UJ
95-50-1-----	1,2-Dichlorobenzene	10.	U
104-51-8-----	n-Butylbenzene	10.	U
96-12-8-----	1,2-Dibromo-3-chloropropane	10.	U
120-82-1-----	1,2,4-Trichlorobenzene	10.	UJ
91-20-3-----	Naphthalene	10.	UJ
87-68-3-----	Hexachlorobutadiene	10.	UJ
87-61-6-----	1,2,3-Trichlorobenzene	10.	UJ

FORM I-2 VOA

1/89 Rev.

Data Qualifier: U = Compounds were analyzed but not detected. The value reported is the method detection limit for reagent water; J = Estimated; D = Diluted Sample; X = Result rejected for failing mass spectral confirmation; E = Concentration exceeded calibration range; B_ = Contaminant found in laboratory method blank.

1E
VOLATILE ORGANICS ANALYSIS DATA SHEET
TENTATIVELY IDENTIFIED COMPOUNDS

EPA SAMPLE NO.

97KR03S04

Name: CSC LTD

AFE

Contract: CRL

Lab Code: ML-100

Case No.: 970310

SAS No.: CSCLTD

SDG No.: -----

Matrix: (soil/water) SOIL

Lab Sample ID: 97KR03S04

Sample wt/vol: 2.58 (g/mL) G

Lab File ID: >P0031

Level: (low/med) LOW

Date Received: 06/26/97

% Moisture: not dec.-----

Date Analyzed: 7/03/97

Column: CAP

Dilution Factor: 1.00000

Number TICs found: 11

CONCENTRATION UNITS:
(ug/L or ug/Kg) ug/Kg

CAS NUMBER	COMPOUND NAME	RT	EST. CONC.	Q
1.	Unknown hydrocarbon	6.04	160.	J
2.	Unknown hydrocarbon	6.81	12.	J
3.	Unknown hydrocarbon	7.07	15.	J
4.	Unknown hydrocarbon	7.15	29.	J
5.	Unknown hydrocarbon	8.27	18.	J
6.	Unknown hydrocarbon	8.77	21.	J
7.	Unknown hydrocarbon	19.35	14.	J
8.	Unknown hydrocarbon	19.79	13.	J
9.	Unknown hydrocarbon	20.14	5.	J
10.	Unknown hydrocarbon	21.52	6.	J
11.	Unknown hydrocarbon	22.40	11.	J
12.				
13.				
14.				
15.				
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY



REGION 5 CENTRAL REGIONAL LABORATORY

536 SOUTH CLARK STREET

CHICAGO, ILLINOIS 60605

Date: SEP 10 1997

Subject: Review of Region 5 Data for CSC Ltd.

From: Charles T. Elly, Director
Region 5 Central Regional Laboratory

To: PRC

Attached are the results for CSC Ltd.

CRL request number 970310

for analyses for ICP

Results are reported for sample designations (with station identifiers in parentheses): 97KR03S03 (Pond C Sediment), 97KR03S04 (Pond A Sediment) and 97KR03S05 (EAF/Lead Loy Floor Dust)

Results Status:

- ☒ (x) Acceptable for Use
- ☐ () Data Qualified, but Acceptable for use
- ☐ () Data Unacceptable for Use

Comments on Data Quality by Reviewer

Data for these samples were inadvertently reported to three significant figures. Data for solid samples are normally reported to no more than two significant figures because of the multiple subsampling steps. Silver was omitted from the report because the data were unusable. The duplicate for chromium had a relative percent difference of 23%, outside the CRL's $\pm 20\%$ limit for solid samples. As the TCLP will still be required for these samples, the data may be used. For all three samples, chromium and lead results in mg/kg exceed the TCLP limits in mg/L by a factor of 20.

Comments by Laboratory Director or Quality Control Coordinator

Review Record for CSC Ltd.

John V. Mow 9 Sept 97
Peer/Task Monitor Review and Date ☒ Reviewed () Unreviewed

John V. Mow 9 Sept 97
Team Leader and Date ☒ Reviewed () Unreviewed

Chuck E. Elzy 9/9/97
QC Coordinator and Date () Reviewed ☒ Unreviewed
(position vacant)

Sylvia Griffin SEP 10 1997
Data Management Coordinator and Date Received

Date Transmitted SEP 10 1997

Please sign and date this form below and return it with any comments to:

Sylvia Griffin
Data Management Coordinator
Region 5 Central Regional Laboratory
ML - 10C

Received by and Date _____

Comments:

SAMPLE REPORT
 Sample 970310 97KR03S03 SITE: CSC Ltd.
 Date analyzed 09/05/97 Correction 0.09552 File name RUN795

Element	Concentration	Units
Aluminum	4700.	mg/kg
Barium	45.2	mg/kg
Beryllium	12.6	mg/kg
Boron	8.0 U	mg/kg
Cadmium	1.0 U	mg/kg
Calcium	2000. U	mg/kg
Chromium	1740.	mg/kg
Cobalt	46.0	mg/kg
Copper	1610.	mg/kg
Iron	269000.	mg/kg
Lead	1080.	mg/kg
Lithium	137.	mg/kg
Magnesium	1000. U	mg/kg
Manganese	3800.	mg/kg
Molybdenum	540.	mg/kg
Nickel	1890.	mg/kg
Sodium	1380.	mg/kg
Strontium	42.1	mg/kg
Tin	145.	mg/kg
Titianium	210.	mg/kg
Vanadium	17.9	mg/kg
Zinc	1310.	mg/kg

KMS
 9997

100
 9/5/97

Sample 970310 SAMPLE REPORT SITE: CSC Ltd.
Date analyzed 09/05/97 97KR03S04 Correction 0.10687 File name RUN795

Element	Concentration	Units
Aluminum	6200. U	mg/kg
Barium	28.5	mg/kg
Beryllium	19.8	mg/kg
Boron	8.0 U	mg/kg
Cadmium	1.0 U	mg/kg
Calcium	2000. U	mg/kg
Chromium	2220.	mg/kg
Cobalt	66.3	mg/kg
Copper	1230.	mg/kg
Iron	360000.	mg/kg
Lead	175.	mg/kg
Lithium	145.	mg/kg
Magnesium	1000.	mg/kg
Manganese	3850.	mg/kg
Molybdenum	879.	mg/kg
Nickel	2680.	mg/kg
Sodium	2660.	mg/kg
Strontium	24.9	mg/kg
Tin	55.9	mg/kg
Titanium	166.	mg/kg
Vanadium	5.0 U	mg/kg
Zinc	260.	mg/kg

KMS
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1000
95997

Sample 970310 SAMPLE REPORT SITE: CSC Ltd.
Date analyzed 09/05/97 97KR03S05 Correction 0.09869 File name RUN795

Element	Concentration	Units
Aluminum	13400.	mg/kg
Barium	23.2	mg/kg
Beryllium	140.	mg/kg
Boron	90.3	mg/kg
Cadmium	1.0 U	mg/kg
Calcium	2000. U	mg/kg
Chromium	492.	mg/kg
Cobalt	34.6	mg/kg
Copper	373.	mg/kg
Iron	495000.	mg/kg
Lead	16400.	mg/kg
Lithium	139.	mg/kg
Magnesium	1000. U	mg/kg
Manganese	2160.	mg/kg
Molybdenum	166.	mg/kg
Nickel	1140.	mg/kg
Sodium	3290.	mg/kg
Strontium	27.8	mg/kg
Tin	4.0 U	mg/kg
Titanium	255.	mg/kg
Vanadium	22.1	mg/kg
Zinc	179.	mg/kg

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run
9/5/97

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY



REGION 5 CENTRAL REGIONAL LABORATORY

536 SOUTH CLARK STREET

CHICAGO, ILLINOIS 60605

Date: SEP 25 1997

Subject: Review of Region 5 Data for CSC Ltd.

From: Charles T. Elly, Director
Region 5 Central Regional Laboratory

To: TETRA TECH

Attached are the results for CSC Ltd.

CRL request number 970310

for analyses for ICP (TCLP)

Results are reported for sample designations (with station identifiers in parentheses): 97KR03S03 (Pond C Sediment), 97KR03S04 (Pond A Sediment), and 97KR03S05 (EAF/Lead Loy Floor Dust)

Results Status:

- ☒ (x) Acceptable for Use
- ☐ () Data Qualified, but Acceptable for use
- ☐ () Data Unacceptable for Use

Comments on Data Quality by Reviewer

Samples were diluted at the time of sample preparation 10-fold to avoid matrix effects from the sodium acetate buffer. Results were evaluated against the action levels given in Table 1 of 40 CFR §261.24, namely 5 mg Ag/L, 100 mg Ba/L, 1 mg Cd/L, 5 mg Cr/L, and 5 mg Pb/L. No violations of these limits were found.

Comments by Laboratory Director or Quality Control Coordinator

Review Record for CSC Ltd.

John Mon 25 Sept 97
Peer Task Monitor Review and Date ☒ Reviewed () Unreviewed

John Mon 25 Sept 97
Team Leader and Date ☒ Reviewed () Unreviewed

QC Coordinator and Date () Reviewed () Unreviewed
(position vacant)

Sylvia Griffin SEP 25 1997
Data Management Coordinator and Date Received

Date Transmitted SEP 25 1997

Please sign and date this form below and return it with any comments to:

Sylvia Griffin
Data Management Coordinator
Region 5 Central Regional Laboratory
ML - 10C

Received by and Date

Comments:

SAMPLE REPORT

SITE: CSC Ltd.

Sample 970310

97KR03S03

Date analyzed 09/19/97

Correction

10.00000

File name RUN818

Element	Concentration	Units
Aluminum	800. U	micrograms/liter
Barium	460.	micrograms/liter
Beryllium	10. U	micrograms/liter
Boron	800. U	micrograms/liter
Cadmium	100. U	micrograms/liter
Calcium	249000.	micrograms/liter
Chromium	100. U	micrograms/liter
Cobalt	76.	micrograms/liter
Copper	60. U	micrograms/liter
Iron	240000.	micrograms/liter
Lead	700. U	micrograms/liter
Lithium	350.	micrograms/liter
Magnesium	19500.	micrograms/liter
Manganese	26600.	micrograms/liter
Molybdenum	150. U	micrograms/liter
Nickel	5050.	micrograms/liter
Silver	60. U	micrograms/liter
Sodium	1480000.	micrograms/liter
Strontium	780.	micrograms/liter
Tin	400. U	micrograms/liter
Titanium	250. U	micrograms/liter
Vanadium	50. U	micrograms/liter
Zinc	2480.	micrograms/liter

Jun
554197KMS
92497

Sample 970310 SAMPLE REPORT SITE: csc Ltd.
Date analyzed 09/19/97 97KR03S04 Correction 10.00000 File name RUN818

Element	Concentration	Units
Aluminum	800. U	micrograms/liter
Barium	180.	micrograms/liter
Beryllium	10. U	micrograms/liter
Boron	800. U	micrograms/liter
Cadmium	100. U	micrograms/liter
Calcium	68400.	micrograms/liter
Chromium	100. U	micrograms/liter
Cobalt	140.	micrograms/liter
Copper	60. U	micrograms/liter
Iron	487000.	micrograms/liter
Lead	700. U	micrograms/liter
Lithium	190.	micrograms/liter
Magnesium	5920.	micrograms/liter
Manganese	10600.	micrograms/liter
Molybdenum	220.	micrograms/liter
Nickel	7390.	micrograms/liter
Silver	60. U	micrograms/liter
Sodium	1260000.	micrograms/liter
Strontium	250.	micrograms/liter
Tin	400. U	micrograms/liter
Titianium	250. U	micrograms/liter
Vanadium	50. U	micrograms/liter
Zinc	1130.	micrograms/liter

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15 Sep 97

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9 24 97

Sample 970310 SAMPLE REPORT SITE: CSC Ltd.
97KR03S05
Date analyzed 09/19/97 Correction 10.00000 File name RUN818

Element	Concentration	Units
Aluminum	13000.	micrograms/liter
Barium	320.	micrograms/liter
Beryllium	10. U	micrograms/liter
Boron	800. U	micrograms/liter
Cadmium	100. U	micrograms/liter
Calcium	513000.	micrograms/liter
Chromium	320.	micrograms/liter
Cobalt	60. U	micrograms/liter
Copper	60. U	micrograms/liter
Iron	1100000.	micrograms/liter
Lead	700. U	micrograms/liter
Lithium	410.	micrograms/liter
Magnesium	145000.	micrograms/liter
Manganese	28700.	micrograms/liter
Molybdenum	150. U	micrograms/liter
Nickel	350.	micrograms/liter
Silver	60. U	micrograms/liter
Sodium	90300.	micrograms/liter
Strontium	530.	micrograms/liter
Tin	400. U	micrograms/liter
Titanium	250. U	micrograms/liter
Vanadium	50. U	micrograms/liter
Zinc	3390.	micrograms/liter

*for
25 Sep 97*

*KMS
9 24 97*

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY



REGION 5 CENTRAL REGIONAL LABORATORY

536 SOUTH CLARK STREET

CHICAGO, ILLINOIS 60605

Date: DEC 17 1997

Subject: Review of Region 5 Data for CSC Ltd.

From: Charles T. Elly, Director
Region 5 Central Regional Laboratory

Chuck Elly

To: TETRA TECH

Attached are the results for CSC Ltd.

CRL request number 970310

for analyses for Antimony and Thallium (TCLP)

Results are reported for sample designations (with station identifiers in parentheses): 97KR03S03 (Pond C Sediment), 97KR03S04 (Pond A Sediment) and 97KR03S05 (EAF/Lead Loy Floor Dust)

Results Status:

- ☒ (x) Acceptable for Use
- ☐ () Data Qualified, but Acceptable for use
- ☐ () Data Unacceptable for Use

Comments on Data Quality by Reviewer

Samples were diluted at the time of sample preparation 10-fold to avoid matrix effects from the sodium acetate buffer. These samples have already been analyzed for the metals given in Table 1 of 40 CFR §261.24. Antimony and thallium were requested because these elements were listed on the NPDES permit for the facility.

Comments by Laboratory Director or Quality Control Coordinator

Review Record for CSC Ltd.

John in person 17 Dec 97
Peer Task Monitor Review and Date (☒ Reviewed () Unreviewed

John in person 17 Dec 97
Team Leader and Date (☒ Reviewed () Unreviewed

Chuck E. Mz 12/17/97
QC Coordinator and Date () Reviewed (☒ Unreviewed
(position vacant)

Sylvia Griffin DEC 17 1997
Data Management Coordinator and Date Received

Date Transmitted **DEC 17 1997**

Please sign and date this form below and return it with any comments to:

Sylvia Griffin
Data Management Coordinator
Region 5 Central Regional Laboratory
ML - 10C

Received by and Date

Comments:

Site Name: CSC LTD.
Date Generated: December 15, 1997

Method Number: AA METALS
Data Set #: 970310

GFAA NARRATIVE for Data Set 970310

Three TCLP extracts (97KR03S03- S05) were submitted for the analysis of total antimony and thallium by GFAA. The samples were collected on 06.25.97 and were received by the CRL on 06.26.97. All samples were part of data set 970310.

The samples were extracted on 09.14.97 following standard CRL TCLP extraction protocols. An aliquot of each extract was preserved with HNO₃ to a pH of less than 2 on 09.14.97. The extracts were digested following standard CRL GFAA digestion protocols on 11.18.97. The hold time for metals is six months. All extracts were analyzed on 12.01.97 and 12.03.97 within the six month hold time for metals.

Analytical results were stored in .DAT files SBMK1201.DAT and TLMK1203.DAT.

All samples were diluted by a factor of ten prior to the digestion. One TCLP extraction blank was submitted and digested with the set of extractions.

Antimony

Data file SBMK1201.DAT

All QC were within the specified control limits of the SOP.

All antimony data are acceptable.

Thallium

Data file TLMK1203.DAT

All QC were within the specified control limits of the SOP.

All thallium data are acceptable.

Narrative by: M. K. [Signature] Chemist, USEPA
Date: 12.15.97

FINAL SAMPLE REPORT FOR GFAA (TCLP)

DATA SET 970310

CSC Ltd.

(μ g/L)

SAMPLE 97KR03	Sb RESULT	Tl RESULT
S03	20 U	20 U
S04	20 U	20 U
S05	20 U	20 U
ANALYST/ DATE	<i>M. Kopp</i> 12.15.97	<i>M. Kopp</i> 12.15.97

Please note: All samples were diluted by a factor of ten prior to digestion.

JKM
17 Dec 97

ATTACHMENT 6

EMS INSPECTION REPORT

(4 Sheets)

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5**

DATE: JUL 31 1997

SUBJECT: Inspection of CSC Limited, 4000 Mahoning Ave., Warren, Ohio on 6-24, 25-97 - Discussion of CSC's Environmental Management System

FROM: Jeffrey Bratko, Environmental Scientist *J.B.*
AECAB, AECAS (MN/OH)

THRU: William MacDowell, Chief *WMD*
AECAB, AECAS (MN/OH)

TO: File

Background

On June 24 and 25, 1997, U.S. EPA conducted a multi-media inspection of CSC Limited (CSC) Warren, Ohio. The inspection was conducted as part of the United States Environmental Protection Agency (U.S. EPA) mini-mill initiative. The full scope of that inspection is not discussed in this report nor are the results of that entire inspection discussed in this memo. This report concerns only that portion of the inspection which involved a discussion and review of CSC's Environmental Management System (EMS).

On June , 1997, U.S. EPA faxed a letter CSC which informed the company of U.S. EPA's plans to inspect the company on June 24 and 25, 1997. Attached to that letter was a list of documents that U.S. EPA wanted CSC to have available for review during the inspection. Among the documents requested was a copy of the company's Environmental Management Plan.

Date of Discussion of CSC's EMS - June 25, 1997.

Participants in Discussion:

U.S. EPA - Jeffrey Bratko, Environmental Scientist
CSC - Jack VanKirk, Manager Environmental Affairs

Summary of Discussion

Environmental Policy

The company does not currently have an extensive written company environmental policy. Employees hired by CSC are given a business card sized document which contains a statement of the philosophy of The Reserve Group (Attachment 1). CSC is one of the companies that comprise The Reserve Group. The Reserve Group statement of its philosophy includes the following:

"Our Citizenship - The Reserve Group conducts business in a professional and ethical manner. We recognize our responsibility to respect and protect the environment in which we work and live. We practice good citizenship at all levels of our organization".

The company also has a mission statement summarized on a business sized card. The mission statement does not discuss matters related to the environmental area (See Attachment 2).

The company is currently developing an environmental policy which is in draft form (see Attachment 3). The CSC environmental policy is being developed in conjunction with an Environmental Resource Manual (ERM). The ERM is currently in draft form and appears to be a form of an environmental management system. The index for the ERM lists seven broad categories of information covered by the manual (see Attachment 4). The ERM is being developed by the companies that comprise The Reserve Group. As part of that effort the ERM includes a list of safety and environmental contacts at each of the companies that form The Reserve Group (see Attachment 5). The ERM was drafted in late March or early April of this year. They hope to finalize it by the end of the year.

Structure of Organization

The previous operator of CSC's facility was Copperweld Steel Company. In the early 1990's environmental matters at Copperweld Steel Company were handled by the manager of engineering and maintenance. In 1992 the company established a position (or positions) to cover environmental matters, health and safety. In September of 1993, the safety manager retired and Jack VanKirk was given responsibility for both safety and environmental matters. In October of 1995, when CSC took over the former Copperweld Steel Company, a decision was made to establish a separate position for safety matters and to recruit a safety manager. A position description and a list of responsibilities has been prepared for the manager of environmental affairs at CSC (See Attachment 6). The manager of environmental affairs reports to the Chief Financial Officer of CSC.

Mr. VanKirk told me that the company and employees are now more aware of environmental issues than they were in 1992. Employees come to management more often to raise environmental concerns. On Monday and Thursday of each week there is a management luncheon. The luncheon is attended by the CEO and his staff, CSC managers and superintendents. Safety related issues are first on the list of issues to be discussed. Approximately 30% of the time some environmental issue is discussed. For example, if the boiler pollution control system is bypassed it is discussed at the luncheon. The environmental matters discussed at the luncheon are relayed to the employees through the Superintendents.

Mr. VanKirk said that CSC considered employee relations an important priority. Salaried staff have been sent to a 2½ day long communications workshop. Some hourly workers have also attended the communications workshop. However, the worker's union has not made a decision

to support the workshop.

I asked whether or not the increased number of safety complaints were due to the communications workshop. Mr. VanKirk did believe the workshop was a factor in the increased complaints.

Communications - Internal and External

In addition to the communications strategy described above, a variety of other mechanisms are used to communicate with employees and external parties regarding environmental matters. When the company's environmental policy is finalized it will be given to all employees. The company currently has two "newsletters" it uses to communicate with employees. One newsletter is issued quarterly and is titled "The Heat". A second newsletter is a two page document issued monthly. Neither document is currently used to discuss environmental information or disseminate environmental information. Mr. VanKirk also has the ability to record messages related to environmental matters. The messages are accessed using a in-plant phone number. For example, U.S. EPA multi-media inspection was the subject of a message available before and during our inspection.

Jack VanKirk appears to be a source of contact with the community outside of the CSC facility when environmental issues arise. He handles calls from the community directly (involving environmental matters). He also has handled calls from students who are working on projects, such as projected related to Earth Day.

Recently, CSC has received some positive feedback on the environmental aspects of the new melt shop they are planning. At recent meetings such as tax abatement hearings (tax abatement requests CSC had made in relation to its new melt shop project) environmental matters related to the new melt shop were discussed briefly.

Jack VanKirk has also handled calls (from the local residents?) concerning incidents such as when CSC is bypassing the air pollution control requirement on the boilers. I asked him if they had any communications with local environmental groups, even contentious communications. He replied that they had not had such communications.

There are also communications with the Reserve Group board concerning environmental matters. A Board Book is prepared for meetings of the Reserve Group and there are always 1 or 2 pages in the board book related to environmental matters.

Another means of internal communications with CSC employees is through the safety committee. For example, the results of air monitoring for asbestos during asbestos abatement operations is of concern to employees and discussed during safety committees meetings.

CSC belongs to the Trumbull County Manufactures Association which does have some contact with local community in the county.

Compliance Management System

I asked Jack VanKirk if the company planned to have a separate compliance management system (CMS) or did they intend to have an integrated EMS and CMS. He replied that they intended to have an integrated EMS and CMS.

Company Ethics Policy

I asked Mr. VanKirk if the company has a company ethics policy similar to the other company policies I had seen posted on various bulletin boards throughout the CSC facility. He replied that there was no general ethics policy.

Audits

I asked about CSC's audit program and whether or not one existed. I specifically noted that I wasn't asking for results but merely seeking information on the use of audits as part of their EMS. Mr. VanKirk said that they do perform internal audits. They have not used independent third parties to perform their audits. I asked if they have considered having the companies in The Reserve Group audit the facilities of other companies within The Reserve Group. Jack VanKirk said that they have considered that option. However, some of the companies within The Reserve Group have facilities with environmental issues that are different from those present at CSC.

Pollution Prevention

CSC doesn't have a distinct pollution prevention (P2) program. The company approaches P2 as a general activity. The focus for P2 activities is on the operation and maintenance side of CSC's organization. CSC does not participate in Ohio Prevention First. The company has changed its lighting to a more energy efficient lighting system. The company also has instituted a pallet return policy. There is also a program to shred wood waste on site rather than send it a landfill. The shredding is done on site but an outside party and the shredded wood waste is used for landscape purpose.

CSC is also looking at doing more segregation of its wastes. The non-segregated waste stream included a lot of metals which WCI can utilize. The reason for doing more segregation of waste is primarily financial rather than motivated by P2.

Another pollution prevention type project under consideration at CSC is the replacement of the pickling line at WCI. The current system includes several tanks containing sulfuric acid. The tanks are in a roofed over area that is only partially enclosed. There are no air pollution controls on the present system. The company is considering replacing the current system with an in line pickling system. The in line system has not been used at a facility like CSC and that fact is playing a part in the evaluation of this project.

ISO 14000, 9000, etc.

I asked Mr. VanKirk if CSC planned to try for certification with the ISO 14000 series of standards. The fact that not all of the ISO 14000 series of standards has been issued is a factor affecting that decision at CSC. They are currently waiting, or holding back, on deciding what to do regarding ISO 14000. Honda is a major customer of CSC and comprised 8 - 9% of CSC's business. Honda hopes to be certified under ISO 14001 by the end of the year. Currently, Honda does not intend to require its suppliers meet ISO 14001. However, it could impose that requirement in the future and that is a possibility CSC will have to factor in its decision making process.

CSC is currently focused on meeting the requirements for certification under QS 9000. The QS certification process is an auto industry based set of standards. The QS standards do include some environmental requirements. For example, the QS 9000 standard requires compliance certifications. CSC has not been able to determine exactly how to provide such compliance certifications. CSC intends to use our mini-mill initiative inspection as part of the compliance certification they must provide to meet the QS 9000 standard. It was not clear to me how they would use our inspection for that purpose. I pointed out that our inspection by itself, would not result in such a certification of compliance.

Objectives and Targets

I asked about CSC's process for setting targets for achieving goals related to environmental matters. Jack VanKirk said that one reason he was moved in the organization to be under the Chief Financial Officer was to insure that environmental targets and objectives are reviewed and accounted for in various projects. Jack VanKirk also participates in certain CSC teams to insure environmental issues are addressed. He is on the project management team for the new melt shop. He is also on the human resource team. The human resource team is involved with union negotiations intended to resolve issues related to plans to contract out certain activities CSC calls "utilities". Those "utilities" include operation of the boilers, electrical service, water treatment, etc. All of those utilities have environmental impacts and that is the reason for Jack VanKirk's involvement in the team.

I asked about CSC's method for dealing with environmental problems that would require some action on the part of CSC. Jack VanKirk provided an example of such a problem. The problem was a weir which was overflowing into the river at times. CSC set a deadline when it would have pumps installed to prevent further overflows. I asked how progress would be tracked to insure progress is being made to achieve environmental targets. Mr. VanKirk said he has to stay on top of the progress. He said that he spends about 50% of his time out in the plant and about 50% in the office.

Monitoring Contractors

I asked Jack VanKirk about CSC's procedures for monitoring contractors who perform environmental work for the company. The procedure he described seems to vary depending on the type of work being performed. For example, in the case of contractors (companies), that come to remove waste oil, CSC checks the trucks to make sure they are arriving at the site empty. In the case of a company that removes waste, primarily mill oil scale, from various location (such as sewers), CSC checks the trucks to make sure they aren't removing waste they shouldn't be removing. Such waste could end up dumped somewhere inappropriate.

In some cases, Jack VanKirk has visited the facilities operated by a contractor. Jack has visited Reserve Environmental's facility that processes certain waste acids generated at CSC. He has also visited a company which processes CSC's air pollution control equipment dust to recover the metals present in the dust.

However, in the case of asbestos abatement contractors, Jack VanKirk relies on both the Mahoning Trumbull Air Pollution Control Agency and the Ohio Department of Health to check on the asbestos abatement contractor who typically does all asbestos abatement work at CSC. Jack said he has visited the asbestos abatement contractors offices and was impressed with their program. I asked about the type of records and documentation that the asbestos abatement contractor provides. Jack VanKirk mentioned that he receives copies of the waste manifests. During the review of the facility records, U.S. EPA also was shown other asbestos related records created by the asbestos abatement contractor.

I asked Jack VanKirk if the EMS they are developing would address contracting and contractors and he replied that it would address that topic. As mentioned earlier in this report CSC is looking at the possibility of contracting out certain "utility" functions currently carried out by CSC personnel.

CSC is assuming that even if they contract out certain "utilities" CSC will still be responsible for being in compliance with all required regulations and limits. CSC may use long term contracts if and when it contracts out the "utilities". A request for proposals has already been issued.

Documentation

I asked Jack VanKirk a number of general questions regarding documentation. He told me that the new EMS they are developing, and the Title 5 permit, will require they increase and improve their recordkeeping. Recently, a manager of maintenance and engineering has been hired. He will be working on the CSC recordkeeping system for air pollution related matters.

I asked if they keep records that would enable CSC to perform a trends analysis on various pollutants and environmental problems. Jack VanKirk replied that they do look at trends over time involving their water treatment operation. However, they do that analysis for waste water

primarily because of the skill of the employee operating their waste water treatment operation. They have not done a trends analysis for air pollution issues but they are aware that their boilers are an air pollution problem. They do track their waste from a cost perspective rather than looking at it from the trends analysis perspective. The waste records caused them to consider more waste segregation to reduce costs. Their records showed them that they were sending a lot of metallics out as wastes.

The company does manifest all hazardous and non-hazardous wastes. They track the waste via a Lotus Spread Sheet. Used bags from the baghouses are tested to see if they are hazardous. If non-hazardous they go to a landfill. The bags used in the baghouse for the grinders and the melt shop are kept segregated from other bags. They are monitored for all metals, including lead. About 1 out of 5 roll off containers of waste are found to have wastes that require disposal as a hazardous waste. Generally, the reason it needs to be treated the way is due to lead. Some lead comes from leaded steel while another source of lead is grease used in some equipment.

Emergency Preparedness

Jack VanKirk told me that they do have a plan for emergencies. However, he was not sure of the degree of testing it had undergone.

Findings and Summary

The CSC Ltd. EMS was not reviewed against, or in comparison with, a regulatory requirement. The systems currently in place at CSC Ltd. do not constitute an effective EMS. Major improvements are needed in recordkeeping, documentation, setting goals and targets, and implementation. The EMS currently under development at CSC Ltd., may correct some of these problems.

Attachments

cc: D. Dart



Tetra Tech EM Inc.

200 E. Randolph Drive, Suite 4700 ♦ Chicago, IL 60601 ♦ (312) 856-8700 ♦ FAX (312) 938-0118

04R 000 007 773

January 7, 1998

Mr. Pat Kuefler
Work Assignment Manager
Region 5 (HRP-9J)
U.S. Environmental Protection Agency
77 West Jackson Boulevard
Chicago, IL 60604

Subject: Compliance Evaluation Inspection Report -- Revision
Minimill Multimedia Compliance Initiative
CSC Ltd., Warren, Ohio
EPA Contract No. 68-W4-0007, Work Assignment No. R05059

Dear Mr. Kuefler:

On September 30, 1997, Tetra Tech EM Inc. (Tetra Tech) submitted a report on the multimedia compliance evaluation inspection (CEI) of the CSC Ltd. minimill facility in Warren, Ohio. Subsequently, Tetra Tech received additional analytical results from the U.S. Environmental Protection Agency (EPA) Central Regional Laboratory (CRL) in Chicago. While these results do not change the conclusions of the CEI, Tetra Tech has revised Table 1 of the report to reflect these data. The revised table (page 5 of the report) is enclosed along with a copy of CRL's analytical report, which should be added to the back of Attachment 2 of the report and a revised Attachment 2 cover sheet. Finally, we have also enclosed a copy of toxicity characteristic leaching procedure (TCLP) analytical results that were recently received from CRL.

If you have any questions regarding this submittal, or would prefer a revised copy of the entire CEI report, please call me at (312) 856-8724.

Sincerely,

Rob Foster
Project Manager

Enclosures

cc: Howard Duckman, EPA
Denny Dart, EPA
Mark Moloney, EPA
Bernie Orenstein, EPA (letter only)
Ed Schuessler, Tetra Tech (letter only)
Art Glazer, Tetra Tech

TABLE 1
CSC LTD. ND PES CEI SAMPLING AND ANALYTICAL RESULTS

Parameter	Units	Permit Limitations		EPA Analytical Results			Comments
		30-day	Daily	Outfall 005	Outfall 002	Blank	
Total Suspended Solids (TSS)	mg/L	77	155	<5	9.2	<5	EPA Method 1664 GFAA ICP GFAA ICP ICP GFAA ICP ICP GFAA CSC flow meter
Oil and Grease (O&G)	mg/L	15	20	2.75	5	1.2	
Thallium	ug/L	-	-	<2	<2	<2	
Silver	ug/L	-	-	<6.0	<6.0	<6.0	
Antimony	ug/L	-	-	<2	4	<2	
Zinc	ug/L	30	90	<20	68.4	<20	
Lead	ug/L	20	65	<70	<70	<70	
Lead	ug/L	20	65	<2	29	<2	
Copper	ug/L	18	59	<6.0	22.3	<6.0	
Cadmium	ug/L	8.2	15.2	<10.0	<10.0	<10.0	
Cadmium	ug/L	8.2	15.2	<0.2	<0.2	<0.2	
Flow Rate	mgd	-	-	0.372	-	-	

Notes:

mg/L = milligrams per liter

ug/L = micrograms per liter

mgd = million gallons per day

- = not analyzed

ICP = inductively coupled plasma

GFAA = graphite furnace atomic absorption

Other metals analyzed by ICP but not included in permit are not reported.

ATTACHMENT 2

**CSC LTD., WARREN, OHIO
NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)
COMPLIANCE EVALUATION INSPECTION (CEI)**

ANALYTICAL REPORTS

(21 Pages)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY



REGION 5 CENTRAL REGIONAL LABORATORY

536 SOUTH CLARK STREET

CHICAGO, ILLINOIS 60605

Date: OCT 06 1997

Subject: Review of Region 5 Data for CSC Ltd.

From: Charles T. Elly, Director *Chuck Elly*
Region 5 Central Regional Laboratory

To: TETRA TECH

Attached are the results for CSC Ltd.

CRL request number 970310

for analyses for Antimony, Cadmium, Lead and Thallium

Results are reported for sample designations: 97KR03S01, 97KR03S02 and 97KR03R06

Results Status:

- ☒ (x) Acceptable for Use
- ☐ () Data Qualified, but Acceptable for use
- ☐ () Data Unacceptable for Use

Comments on Data Quality by Reviewer

Analytical spike recoveries for the cadmium analysis of samples 97KR03S01 and 97KR03S02 (86.8% and 86.5%) were outside the CRL acceptance limits of $100 \pm 10\%$. The matrix spike recovery for cadmium for the batch was in control (103.7%; CRL limits $100 \pm 15\%$). The results for cadmium (all less than $0.2 \mu\text{g Cd/L}$) were well below the NPDES permit limit of $8.2 \mu\text{g Cd/L}$, leading to the conclusion that there was little cause for reanalysis. The data may be used as is. The lead result for sample 97KR03S02 is above the NPDES permit limit for this facility of $20 \mu\text{g Pb/L}$.

Comments by Laboratory Director or Quality Control Coordinator

Review Record for CSC Ltd.

John V. Mon 3 Oct 97
Peer Task Monitor Review and Date (✓) Reviewed () Unreviewed

John V. Mon 3 Oct 97
Team Leader and Date (✓) Reviewed () Unreviewed

Chuck E. Elz 10/3/97
QC Coordinator and Date () Reviewed (✓) Unreviewed
(position vacant)

Sylvia Griffin OCT 06 1997
Data Management Coordinator and Date Received

Date Transmitted OCT 06 1997

Please sign and date this form below and return it with any comments to:

Sylvia Griffin
Data Management Coordinator
Region 5 Central Regional Laboratory
ML - 10C

Received by and Date

Comments:

Site Name: CSC Ltd.
Date Generated: October 2, 1997

Method Number: AA METALS
Data Set #: 970310

GFAA NARRATIVE for Data Set 970310

Three water samples (97KR03S01, S02 and R06) were submitted for the analysis of total cadmium, lead, antimony and thallium by GFAA. The samples were collected on 06.25.97 and were received by the CRL properly preserved on 06.26.97.

The samples were digested following standard CRL GFAA digestion protocols for waters on 09.10.97. The samples were analyzed on 09.12.97 through 09.30.97 within the six month hold time for metals.

Analytical results were stored in .DAT files CDMK0918.DAT, PBMK0912.DAT, SBMK0930.DAT and TLMK0918.DAT..

Cadmium

Data File CDMK0918.DAT

The analytical spikes performed on samples 97KR03S01 (86.8%) and 97KR03S02 (86.5%) were outside of the control limits of 90-110% as specified in the SOP. This was discussed with Dr. John Morris and was determined to be caused by an unknown negative interference. The magnitude of the negative interference was not considered to be significant enough to affect the integrity of the data, especially in light of the permit limit of 8.2 $\mu\text{g Cd/L}$.

All remaining QC were within the specified control limits of the SOP.

All cadmium data are acceptable.

Lead

Data File PBMK0912.DAT

All QC were within the specified control limits of the SOP.

All lead data are acceptable.

Narrative by: M. Kupp Chemist, USEPA
Date: 10.2.97

FINAL SAMPLE REPORT FOR GFAA
DATA SET 970310
CSC Ltd.
($\mu\text{g/L}$)

SAMPLE 97KR03	Cd RESULT	Pb RESULT	Sb RESULT	Tl RESULT
S01	0.2 U	2 U	2 U	2 U
S02	0.2 U	29	4	2 U
R06	0.2 U	2 U	2 U	2 U
ANALYST/ DATE	<i>M. Kapp</i> 10.2.97	<i>M. Kapp</i> 10.2.97	<i>M. Kapp</i> 10.2.97	<i>M. Kapp</i> 10.2.97

mm
30.6.97

Antimony

Data File SBMK0930.DAT

All QC were within the specified control limits of the SOP.

All antimony data are acceptable.

Thallium

Data File TLMK0918.DAT

All QC were within the specified control limits of the SOP.

All thallium data are acceptable.

Narrative by: W. L. P. P. Chemist, USEPA
Date: 10.2.97

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY



REGION 5 CENTRAL REGIONAL LABORATORY

536 SOUTH CLARK STREET

CHICAGO, ILLINOIS 60605

Date: DEC 17 1997

Subject: Review of Region 5 Data for CSC Ltd.

From: Charles T. Elly, Director
Region 5 Central Regional Laboratory

A handwritten signature in black ink, appearing to read "Chuck Elly".

To: TETRA TECH

Attached are the results for CSC Ltd.

CRL request number 970310

for analyses for Antimony and Thallium (TCLP)

Results are reported for sample designations (with station identifiers in parentheses): 97KR03S03 (Pond C Sediment), 97KR03S04 (Pond A Sediment) and 97KR03S05 (EAF/Lead Loy Floor Dust)

Results Status:

- ☒ (x) Acceptable for Use
- ☐ () Data Qualified, but Acceptable for use
- ☐ () Data Unacceptable for Use

Comments on Data Quality by Reviewer

Samples were diluted at the time of sample preparation 10-fold to avoid matrix effects from the sodium acetate buffer. These samples have already been analyzed for the metals given in Table 1 of 40 CFR §261.24. Antimony and thallium were requested because these elements were listed on the NPDES permit for the facility.

Comments by Laboratory Director or Quality Control Coordinator

Review Record for CSC Ltd.

John is plan 17 Dec 97
Peer Task Monitor Review and Date (☒ Reviewed () Unreviewed

John is plan 17 Dec 97
Team Leader and Date (☒ Reviewed () Unreviewed

Chuck E. Mz 12/17/97
QC Coordinator and Date () Reviewed (☒ Unreviewed
(position vacant)

Sylvia Griffin DEC 17 1997
Data Management Coordinator and Date Received

Date Transmitted **DEC 17 1997**

Please sign and date this form below and return it with any comments to:

Sylvia Griffin
Data Management Coordinator
Region 5 Central Regional Laboratory
ML - 10C

Received by and Date

Comments:

Site Name: CSC LTD.

Date Generated: December 15, 1997

Method Number: AA METALS

Data Set #: 970310

GFAA NARRATIVE for Data Set 970310

Three TCLP extracts (97KR03S03- S05) were submitted for the analysis of total antimony and thallium by GFAA. The samples were collected on 06.25.97 and were received by the CRL on 06.26.97. All samples were part of data set 970310.

The samples were extracted on 09.14.97 following standard CRL TCLP extraction protocols. An aliquot of each extract was preserved with HNO₃ to a pH of less than 2 on 09.14.97. The extracts were digested following standard CRL GFAA digestion protocols on 11.18.97. The hold time for metals is six months. All extracts were analyzed on 12.01.97 and 12.03.97 within the six month hold time for metals.

Analytical results were stored in .DAT files SBMK1201.DAT and TLMK1203.DAT.

All samples were diluted by a factor of ten prior to the digestion. One TCLP extraction blank was submitted and digested with the set of extractions.

Antimony

Data file SBMK1201.DAT

All QC were within the specified control limits of the SOP.

All antimony data are acceptable.

Thallium

Data file TLMK1203.DAT

All QC were within the specified control limits of the SOP.

All thallium data are acceptable.

Narrative by: M. K. [Signature] Chemist, USEPA
Date: 12.15.97

FINAL SAMPLE REPORT FOR GFAA (TCLP)

DATA SET 970310

CSC Ltd.

(μ g/L)

SAMPLE 97KR03	Sb RESULT	Tl RESULT
S03	20 U	20 U
S04	20 U	20 U
S05	20 U	20 U
ANALYST/ DATE	<i>M. Kopp</i> 12.15.97	<i>M. Kopp</i> 12.15.97

Please note: All samples were diluted by a factor of ten prior to digestion.

JKM
17 Dec 97

0HR 000 007 773



Tetra Tech EM Inc.

200 E. Randolph Drive, Suite 4700 ♦ Chicago, IL 60601 ♦ (312) 856-8700 ♦ FAX (312) 938-0118

September 30, 1997

Mr. Pat Kuefler
Work Assignment Manager
Region 5 (HRP-8J)
U.S. Environmental Protection Agency
77 West Jackson Boulevard
Chicago, IL 60604

Subject: Compliance Evaluation Inspection Report
Minimill Multimedia Compliance Initiative
CSC Ltd., Warren, Ohio
EPA Contract No. 68-W4-0007, Work Assignment No. R05059

Dear Mr. Kuefler:

On June 24 and 25, 1997, Tetra Tech EM Inc. (formerly PRC Environmental Management, Inc.) participated in a multimedia compliance evaluation inspection (CEI) of the CSC Ltd. minimill facility in Warren, Ohio. Tetra Tech's primary responsibility was to conduct a Clean Water Act CEI of the facility. Tetra Tech evaluated the facility's compliance with its National Pollutant Discharge Elimination System (NPDES) permit.

Enclosed is Tetra Tech's CEI report for the CSC facility. The report discusses Tetra Tech's observations and findings, including the analytical results of samples collected by Tetra Tech during the CEI. Samples were analyzed by the U.S. Environmental Protection Agency (EPA) Central Regional Laboratory (CRL) in Chicago.

As directed by EPA's Resource Conservation and Recovery Act (RCRA) inspector, Sirtaj Ahmed, Tetra Tech also collected samples of potential hazardous wastes or areas of potential releases of hazardous materials at the CSC facility. These samples were also analyzed by the CRL, and the results were transmitted to Mr. Ahmed separately.

If you have any questions, please call me at (312) 856-8724.

Sincerely,

Rob Foster
Project Manager

Enclosure

cc: Howard Duckman, EPA
Denny Dart, EPA
Mark Moloney, EPA
Bernie Orenstein, EPA (letter only)
Ed Schuessler, PRC (letter only)

ENCLOSURE

**CSC LTD., WARREN, OHIO
NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)
COMPLIANCE EVALUATION INSPECTION (CEI)**

(Five Pages)

CSC LTD., WARREN, OHIO
NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)
COMPLIANCE EVALUATION INSPECTION (CEI)

U.S. Environmental Protection Agency (EPA) Region 5 is conducting a multimedia compliance evaluation initiative for minimills in the region. As part of this initiative, Tetra Tech EM Inc. (formerly, PRC Environmental Management, Inc.) conducted a National Pollutant Discharge Elimination System (NPDES) compliance evaluation inspection (CEI) of the CSC Ltd. facility, in Warren, Ohio. Rob Foster of Tetra Tech inspected the facility on June 24 and 25, 1997, as a member of an EPA multimedia inspection team led by Mark Moloney of EPA's Eastern District Office (EDO). Paul Novak of EDO assisted in the NPDES CEI.

The CSC facility background, inspection procedures, and a summary of CEI findings are discussed below.

FACILITY BACKGROUND

The basis of the CEI is the CSC facility's NPDES permit No. OH0011207 (Ohio No. 3ID00050). The permit was issued on August 5, 1996, and is effective from September 1, 1996, to October 31, 2000. The permit identifies three outfalls: pump house intake strainer backwash water (outfall 003), pumphouse intake traveling screen backwash water (outfall 004), and wastewater treatment plant (WWTP) effluent (outfall 005). Discharge limitations and monitoring requirements are established at outfall 005 for total suspended solids, oil and grease, metals (including thallium, silver, antimony, zinc, lead, copper, and cadmium), and flow rate (see attached Table 1). Any discharges from outfalls 003 and 004 are required to be free from process waste and other contaminants.

The last NPDES CEI of the CSC facility was conducted by Ohio Environmental Protection Agency (OEPA) on December 6, 1996. Key findings are summarized below:

- The old sanitary package plant rendered only limited primary treatment because of a lack of maintenance.
- Ohio Star Forge, a steel forging operation situated on a separate property surrounded by CSC, was discharging wastewater and sewage to the CSC facility even though it no longer has an ownership relationship with CSC and does not have an NPDES permit.

- An unauthorized discharge (bypass) was occurring at the weir located at former NPDES outfall 002. Approximately 50 gallons per minute (gpm) of process and sanitary wastewater was flowing into the Mahoning River.

OEPA issued a notice of violation (NOV) to CSC as a result of the unauthorized discharge during the December 1996 CEI and during follow-up inspections by OEPA on December 16, 1996; January 23, 1997; and February 14, 1997.

INSPECTION PROCEDURES

The CEI consisted of a facility walk-through to identify key wastewater sources and possible unpermitted discharges, inspection of the facility's lagoon system, inspection of the WWTP, interview of the WWTP operator, observation of NPDES compliance sampling, and review of NPDES compliance sampling analytical results and discharge monitoring reports (DMR). Tetra Tech also collected wastewater samples for analysis by EPA's Central Regional Laboratory (CRL). Tetra Tech's observations of facility operations and NPDES compliance sampling activities during the CEI are discussed below.

Facility Operations

CSC uses approximately 21 to 22 million gallons per day (mgd) of process water that is recirculated through a series of three settling lagoons (Ponds A, B, and C). Water is discharged from the system through the WWTP at rates of up to 1.1 mgd. System makeup water is taken from the Mahoning River. Both recycled lagoon water and river water are filtered before pumping to the mill. Backwash water from the lagoon water filter is discharged to the second lagoon (Pond B); backwash water from the river water system is discharged back to the river.

The water level in the lagoon system is controlled by varying the rates of river water intake and WWTP discharge. In response to the NOV, CSC has installed a high-level alarm at the location of former NPDES outfall 002, which now serves as the influent wet well to the WWTP. The alarm causes the river water intake pumps to automatically shut off, and CSC can manually increase the WWTP flow to further reduce the water level.

An oil skimmer is located near the outlet of each lagoon in the system. During the inspection, a contractor was removing additional oil from the third lagoon (Pond C). This operation appeared to be effective. However, the area near the skimmer was stained with oil.

The WWTP was constructed in 1992 and started operating in January 1993. It consists of the following unit processes: flash mixing with ferric chloride, flocculation with polymer addition, clarification, gravity filtration with sand and anthracite mixed media, and gravity sludge thickening. Thickened sludge is disposed of off-site as nonhazardous waste; a sludge filter press is no longer used. CSC is investigating the use of biotreatment technologies to treat sludge from its lagoons for possible reuse as clean fill material.

Influent flow to the WWTP is measured by a magnetic flow meter, and effluent flow is measured by the height over a V-notched weir. During the inspection, influent and effluent flow rates were 240 and 258 gpm, respectively, corresponding to 0.346 and 0.372 mgd, respectively. Permitted contaminant loading rates are based on a flow rate of 1.4 mgd. CSC also continuously monitors effluent pH. During the inspection, effluent pH was within the permitted range of 6.5 to 9.0 standard pH units.

The WWTP has various sumps and level alarms to indicate spills. The sumps can be pumped to the backwash water holding pit whose contents are pumped to Pond B as required. In the event of a major system problem, the WWTP can be shut down and all water can be recycled to the mill.

CSC's WWTP operator conducts routine maintenance activities on monthly, seasonal, and annual bases, according to an operation and maintenance manual provided by the WWTP design engineers. An outside contractor performs monthly maintenance of major equipment. During the inspection, the plant appeared to be well maintained; however, no maintenance records were available.

NPDES Compliance Sampling and Analysis Activities

CSC contracts NPDES compliance sampling and analysis activities to American Analytical Laboratories (AAL). Tetra Tech observed AAL collecting samples during the CEI. A 24-hour, time-composited sample of WWTP effluent was collected for total suspended solids and metals analyses. A grab sample

was collected for oil and grease analysis. AAL measured the temperature and pH of WWTP effluent using a calibrated meter. The composite sample was collected inside a small refrigerator; however, the temperature of the sample was 9.7°C, which exceeds the recommended 4°C. Although not required by CSC's NPDES permit, AAL also collected a grab sample of river water for analysis.

Tetra Tech collected grab samples at outfalls 002 and 005 during the inspection. Tetra Tech also collected a reagent blank. Split samples were provided to CSC. Table 1 compares Tetra Tech sampling and analyses results to NPDES permit requirements. The laboratory analytical reports are included in Attachment 2.

SUMMARY OF FINDINGS

Key findings of Tetra Tech's CEI are summarized below.

- CSC has addressed the prior NOV by installing a high-level alarm system at the location of former outfall 002.
- DMRs indicate that CSC is in compliance with its NPDES permit requirements. Samples collected by Tetra Tech also met permit concentration limitations. However, monthly average concentrations are not calculated on a flow-proportioned basis as required by the permit's general conditions (see definition for "30-day concentration limitation"). CSC should revise its method for calculating monthly average concentrations to comply with permit requirements. It is also recommended (but not required) that CSC request duplicate sample analyses about once per year as a quality control check on analytical results.
- CSC's effluent composite sample should be maintained at a temperature of less than 4°C.
- CSC should maintain WWTP maintenance records that are available for inspection. A written WWTP maintenance schedule should also be available.

TABLE 1
CSC LTD. NDPES CEI SAMPLING AND ANALYTICAL RESULTS

Parameter	Units	Permit Limitations		EPA Analytical Results			Comments
		30-day	Daily	Outfall 005	Outfall 002	Blank	
Total Suspended Solids (TSS)	mg/L	77	155	<5	9.2	<5	EPA Method 1664 Not included in ICP ICP Not included in ICP ICP ICP ICP CSC flow meter
Oil and Grease (O&G)	mg/L	15	20	2.75	5	1.2	
Thallium	ug/L	-	-	-	-	-	
Silver	ug/L	-	-	<6.0	<6.0	<6.0	
Antimony	ug/L	-	-	-	-	-	
Zinc	ug/L	30	90	<20	68.4	<20	
Lead	ug/L	20	65	<70	<70	<70	
Copper	ug/L	18	59	<6.0	22.3	<6.0	
Cadmium	ug/L	8.2	15.2	<10.0	<10.0	<10.0	
Flow Rate	mgd	-	-	0.372	-	-	

Notes:

mg/L = milligrams per liter

ug/L = micrograms per liter

mgd = million gallons per day

- = not analyzed

ICP = inductively coupled plasma

Other metals analyzed by ICP but not included in permit are not reported.

ATTACHMENT 1

**CSC LTD., WARREN, OHIO
NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)
COMPLIANCE EVALUATION INSPECTION (CEI)**

INSPECTION AND CHAIN-OF-CUSTODY FORMS

(15 Pages)



United States Environmental Protection Agency
Washington, D.C. 20460

Water Compliance Inspection Report

Form Approved.
OMB No. 2040-0057
Approval expires 8-31-98

Section A: National Data System Coding (i.e., PCS)

Transaction Code	NPDES	yr/mo/day	Inspection Type	Inspector	Fac Type
1 <u>N</u> 2 <u>5</u> 3 <u>0</u> <u>H</u> <u>0</u> <u>0</u> <u>1</u> <u>1</u> <u>2</u> <u>0</u> <u>7</u> 11 12 <u>9</u> <u>7</u> <u>0</u> <u>6</u> <u>2</u> <u>4</u> 17 18 <u>M</u> 19 <u>C</u> 20 <u>2</u>					
Remarks					
21 <u>3</u> <u>I</u> <u>D</u> <u>0</u> <u>0</u> <u>0</u> <u>9</u> <u>0</u> 66					
Inspection Work Days	Facility Self-Monitoring Evaluation Rating	B1	QA	Reserved	
67 <u> </u> <u> </u> <u> </u> 69 70 <u> </u> 71 <u> </u> 72 <u> </u> 73 <u> </u> <u> </u> 74 75 <u> </u> <u> </u> <u> </u> <u> </u> <u> </u> <u> </u> 80					

Section B: Facility Data

Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number) <u>CSC Ltd.</u> <u>4000 Mahoning Ave.</u> <u>Warren, OH 44481</u>	Entry Time/Date <u>0800/6-24-97</u>	Permit Effective Date <u>09/01/96</u>
	Exit Time/Date <u>1630/6-25-97</u>	Permit Expiration Date <u>10/31/00</u>
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) <u>Jack Van Kirk</u> <u>Manager, Environmental Affairs</u>	Other Facility Data	
Name, Address of Responsible Official/Title/Phone and Fax Number <div style="text-align: right;">Contacted <input type="checkbox"/> Yes <input type="checkbox"/> No</div>		

Section C: Areas Evaluated During Inspection (Check only those areas evaluated)

<input checked="" type="checkbox"/> Permit	<input checked="" type="checkbox"/> Flow Measurement	<input type="checkbox"/> Operations & Maintenance	<input type="checkbox"/> CSO/SSO (Sewer Overflow)
<input checked="" type="checkbox"/> Records/Reports	<input checked="" type="checkbox"/> Self-Monitoring Program	<input type="checkbox"/> Sludge Handling/Disposal	<input type="checkbox"/> Pollution Prevention
<input checked="" type="checkbox"/> Facility Site Review	<input checked="" type="checkbox"/> Compliance Schedules	<input type="checkbox"/> Pretreatment	<input checked="" type="checkbox"/> Multimedia
<input checked="" type="checkbox"/> Effluent/Receiving Waters	<input type="checkbox"/> Laboratory	<input type="checkbox"/> Storm Water	<input type="checkbox"/> Other:

Section D: Summary of Findings/Comments (Attach additional sheets of narrative and checklists as necessary)

- 1) now addressed by installing high-level alarm at old outfall 002
- 2) Ave. concentrations on DMRs not calculated using flow proportion formula
- 3) 24-hr composite collected w/in refrigerator at temperature $>4^{\circ}\text{C}$
- 4) written maintenance records not available

Name(s) and Signature(s) of Inspector(s) <u>Rob Foster</u> <u>[Signature]</u>	Agency/Office/Phone and Fax Numbers <u>PRC Environmental Mgmt. Inc.</u> <u>312-856-8724 / 312-938-0118</u>	Date <u>6/24/97</u>
Signature of Management Q A Reviewer	Agency/Office/Phone and Fax Numbers	Date

INSTRUCTIONS

Section A: National Data System Coding (*i.e.*, PCS)

Column 1: Transaction Code: Use N, C, or D for New, Change, or Delete. All inspections will be *new* unless there is an error in the data entered.

Columns 3-11: NPDES Permit No. Enter the facility's NPDES permit number. (*Use the Remarks columns to record the State number, if necessary.*)

Columns 12-17: Inspection Date. Insert the date entry was made into the facility. Use the year/month/day format (e.g., 94/06/30 = June 30, 1994).

Column 18: Inspection Type. Use one of the codes listed below to describe the type of inspection:

A Performance Audit	L Enforcement Case Support	2 IU Sampling Inspection
B Compliance Biomonitoring	M Multimedia	3 IU Non-Sampling Inspection
C Compliance Evaluation (non-sampling)	P Pretreatment Compliance Inspection	4 IU Toxics Inspection
D Diagnostic	R Reconnaissance	5 IU Sampling Inspection with Pretreatment
E Corps of Engineers Inspection	S Compliance Sampling	6 IU Non-Sampling Inspection with Pretreatment
F Pretreatment Follow-up	U IU Inspection with Pretreatment Audit	7 IU Toxics with Pretreatment
G Pretreatment Audit	X Toxics Inspection	
I Industrial User (IU) Inspection	Z Sludge	

Column 19: Inspector Code. Use one of the codes listed below to describe the *lead agency* in the inspection.

C — Contractor or Other Inspectors (<i>Specify in Remarks columns</i>)	N — NEIC Inspectors
E — Corps of Engineers	R — EPA Regional Inspector
J — Joint EPA/State Inspectors—EPA Lead	S — State Inspector
	T — Joint State/EPA Inspectors—State lead

Column 20: Facility Type. Use one of the codes below to describe the facility.

- 1 — Municipal. Publicly Owned Treatment Works (POTWs) with 1987 Standard Industrial Code (SIC) 4952.
- 2 — Industrial. Other than municipal, agricultural, and Federal facilities.
- 3 — Agricultural. Facilities classified with 1987 SIC 0111 to 0971.
- 4 — Federal. Facilities identified as Federal by the EPA Regional Office.

Columns 21-66: Remarks. These columns are reserved for remarks at the discretion of the Region.

Columns 67-69: Inspection Work Days. Estimate the total work effort (to the nearest 0.1 work day), up to 99.9 days, that used to complete the inspection and submit a QA reviewed report of findings. This estimate includes the accumulative effort of all participating inspectors; any effort for laboratory analyses, testing, and remote sensing; and the billed payroll time for travel and pre and post inspection preparation. This estimate does not require detailed documentation.

Column 70: Facility Evaluation Rating. Use information gathered during the inspection (regardless of inspection type) to evaluate the quality of the facility self-monitoring program. Grade the program using a scale of 1 to 5 with a score of 5 being used for very reliable self-monitoring programs, 3 being satisfactory, and 1 being used for very unreliable programs.

Column 71: Biomonitoring Information. Enter D for static testing. Enter F for flow through testing. Enter N for no biomonitoring.

Column 72: Quality Assurance Data Inspection. Enter Q if the inspection was conducted as followup on quality assurance sample results. Enter N otherwise.

Columns 73-80: These columns are reserved for regionally defined information.

Section B: Facility Data

This section is self-explanatory except for "Other Facility Data," which may include new information not in the permit or PCS (e.g., new outfalls, names of receiving waters, new ownership, and other updates to the record).

Section C: Areas Evaluated During Inspection

Check only those areas evaluated by marking the appropriate box. Use Section D and additional sheets as necessary. Support the findings, as necessary, in a brief narrative report. Use the headings given on the report form (e.g., Permit, Records/Reports) when discussing the areas evaluated during the inspection. The heading marked "Multimedia" may indicate medias such as CAA, RCRA, and TSCA. The heading marked "Other" may indicate activities such as SPCC, BMPs, and concerns that are not covered elsewhere.

Section D: Summary of Findings/Comments

Briefly summarize the inspection findings. This summary should abstract the pertinent inspection findings, not replace the narrative report. Reference a list of attachments, such as completed checklists taken from the NPDES Compliance Inspection Manuals and pretreatment guidance documents, including effluent data when sampling has been done. Use extra sheets as necessary.

NPDES No. OH 0011207 / OHIO # 3 ID 00050

Facility Name CSC Ltd.

City and State Warren, Ohio

Date of Inspection June 24 & 25, 1997

RECORDS, REPORTS, AND SCHEDULES CHECKLIST

A. PERMIT VERIFICATION

YES	NO	N/A	INSPECTION OBSERVATION CONTAINED IN PERMIT
✓			1. Correct name and mailing address of permittee.
✓			2. Facility is as described in permit.
✓			3. Notification has been given to EPA/State of new, different, increased discharges.
✓			4. Accurate records of influent volume are maintained, when appropriate.
✓			5. Number and location of discharge points are as described in the permit.
✓			6. Name and location of receiving waters are correct.
✓			7. All discharges are permitted.

B. RECORDKEEPING AND REPORTING EVALUATION

			RECORDS AND REPORTS ARE MAINTAINED AS REQUIRED BY PERMIT
✓			1. All required information is available, complete, and current; and
✓			2. Information is maintained for required period.
✓			3. Analytical results are consistent with the data reported on the IMR's.
			4. Sampling and Analysis Data are adequate and include:
✓			a. Dates, times, location of sampling
✓			b. Name of individual performing sampling
✓			c. Analytical methods and techniques
✓			d. Results of analysis
✓			e. Dates of analysis
✓			f. Name of person performing analysis
		✓	g. Instantaneous flow at grab sample stations
			5. Monitoring records are adequate and include
✓			a. <u>Flow</u> <u>pH</u> D.O., etc. as required by permit <i>strip charts</i>
✓			b. Monitoring charts
		✓	6. Laboratory equipment calibration and maintenance records are adequate.
			7. Plant Records are adequate* and include
✓			a. O&M Manual
✓			b. "As-built" engineering drawings
	✓		c. Schedules and dates of equipment maintenance and repairs
✓			d. Equipment supplies manual
		✓	e. Equipment data cards

* Required only for facilities built with Federal construction grant funds.

RECORDS, REPORTS, AND SCHEDULES CHECKLIST

B. Recordkeeping and Reporting Evaluation (continued)

YES	NO	N/A	8. Pretreatment records are adequate and included:
			a. Industrial Waste Ordinance (or equivalent documents)
			b. Inventory of industrial waste contributors, including:
			1. Compliance records
			2. User charge information
			9. SPCC properly completed, when required.
			10. Best Management Practices Program available, when required.

C. Compliance Schedule Status Review

			THE PERMITEE IS MEETING THE COMPLIANCE SCHEDULE
			1. The permittee has obtained necessary approvals to begin construction.
			2. Financing arrangements are completed.
			3. Contracts for engineering services has been executed.
			4. Design plans and specifications have been completed.
			5. Construction has begun.
			6. Construction is on schedule.
			7. Equipment acquisition is on schedule.
			8. Construction has been completed.
			9. Start-up has begun.
			10. The permittee has requested an extension of time.
			11. The permittee has met compliance schedule.

RECORDS, REPORTS, AND SCHEDULES CHECKLIST

D. POTW Pretreatment Requires Review

YES	NO	N/A	THE FACILITY IS SUBJECT TO PRETREATMENT REQUIREMENTS
			1. Status of POTW Pretreatment Program
			a. The POTW Pretreatment Program has been approved by EPA. (If not, is approval in progress? _____)
			b. The POTW is in compliance with the Pretreatment Program Compliance Schedule. (If not, what is due, and intent of the POTW to remedy)
			2. Status of Compliance with Categorical Pretreatment Standards.
			a. How many industrial users of the POTW are subject to Federal or State Pretreatment Standards? _____
			b. Are these industries aware of their responsibility to comply with applicable standards?
			c. Have baseline monitoring reports (403.12) been submitted for these industries?
			i. Have categorical industries in noncompliance (on EMR reports) submitted compliance schedules?
			ii. How many categorical industries on compliance schedules are meeting the schedule deadlines? _____
			d. If compliance deadlines has passed, have all industries submitted 90 day compliance reports?
			e. Are all categorical industries submitting the required semiannual report?
			f. Are all new industrial discharges in compliance with new source pretreatment standards?
			g. Has the POTW submitted its annual pretreatment report?
			h. Has the POTW taken enforcement action against noncomplying industrial users?
			i. Is the POTW conducting inspections of industrial contributors?
			3. Are the industrial users subject to Prohibited Limits (403.5) and local limits more stringent than EPA in compliance? (If not, explain why, including need for revision limits.)

FACILITY SITE REVIEW CHECKLIST

YES	NO	N/A	
	<input checked="" type="checkbox"/>		1. Standby power or other equivalent provision is provided.
<input checked="" type="checkbox"/>			2. Adequate alarm system for power or equipment failures is available.
		<input checked="" type="checkbox"/>	3. POTW handles and disposes of sludge according to applicable Federal, State, and local regulators.
	<input checked="" type="checkbox"/>		4. All treatment units, other than back-up units, are in service. <i>- H₂SO₄ system } not</i> <i>- filter press } needed</i>
<input checked="" type="checkbox"/>			5. Procedures for facility operation and maintenance exist.
	<input checked="" type="checkbox"/>		6. Organization plan (chart) for operation and maintenance is provided.
<input checked="" type="checkbox"/>			7. Operating schedules are established. <i>24 hrs./day, 7 days/wk</i> <i>operator 6 days/wk plus on-call</i>
<input checked="" type="checkbox"/>			8. Emergency plan for treatment control is established. <i>(not written)</i>
			9. Operating management control documents are current and include:
	<input checked="" type="checkbox"/>		a. Operating report
<input checked="" type="checkbox"/>			b. Work schedule
		<input checked="" type="checkbox"/>	c. Activity report (time cards)
			10. Maintenance record system exists and includes:
	<input checked="" type="checkbox"/>		a. As-built drawings
	<input checked="" type="checkbox"/>		b. Shop drawings
	<input checked="" type="checkbox"/>		c. Construction specifications
	<input checked="" type="checkbox"/>		d. Maintenance history
	<input checked="" type="checkbox"/>		e. Maintenance costs
<input checked="" type="checkbox"/>			11. Adequate number of qualified operators are on hand. <i>1 + backup</i>
<input checked="" type="checkbox"/>			12. Established procedures are available for training new operators. <i>use op. manual</i>
<input checked="" type="checkbox"/>			13. Adequate spare parts and supplies inventory and major equipment specifications are maintained. <i>belts, filters, oil, etc; spare pumps</i>
<input checked="" type="checkbox"/>			14. Instruction files are kept for operation and maintenance of each item of major equipment.
<input checked="" type="checkbox"/>			15. Operation and maintenance manual is available.
		<input checked="" type="checkbox"/>	16. Regulatory agency was notified of bypassing. (Dates _____)

FACILITY SITE REVIEW CHECKLIST

YES	NO	N/A	
			17. Hydraulic and/or organic overloads are experienced. Reason for overloads _____ _____ _____ _____
	✓		18. Up-to-date equipment repair records are maintained.
		✓	19. Dated tags show out of service equipment.
		NE	20. Routine and preventive maintenance are scheduled, performed on time.

PERMITTEE SAMPLING INSPECTION CHECKLIST

A. Permittee Sampling Evaluation

YES	NO	N/A	
✓			1. Samplings are taken at sites specified in permit.
✓			2. Locations are adequate for representative samples.
?	✓		3. Flow proportioned samples are obtained where required by permit. <i>not flow proportioned</i>
✓	-		4. Sampling and analysis completed on parameters specified by permit.
✓			5. Sampling and analysis done in frequency specified by permit.
			6. Permittee is using method of sample collection required by permit. Required Method: _____ If not, method being used is: <input type="checkbox"/> Grab <input type="checkbox"/> Manual composite <input checked="" type="checkbox"/> Automatic composite
			7. Sample collection procedures are adequate:
✓			a. Samples refrigerated during compositing <i>but Temp = 9.7°C</i>
✓			b. Proper preservation technique used
		NE	c. Container and sample holding times before analyses conform with 40 CFR 136.3
*	✓		8. Monitoring and analyses are performed more often than required by permit. If so, results reported in permittee's self-monitoring report. <i>π</i>

B. Sampling Inspection Procedures and Observations

✓			1. Grab samples obtained
		✓	2. Composite sample obtained Composite frequency _____ Preservation _____
		✓	3. Sample refrigerated during compositing.
	✓		4. Flow proportioned sample obtained.
	✓		5. Sample obtained from facility sampling device. <i>grab sampled into jar</i>
✓			6. Sample representative of volume and nature of discharge.
✓			7. Sample split with permittee.
✓			8. Chain of custody procedures employed.

** Analyze additional samples (river influent & fore bay) but not reported
NE. Not evaluated*

FLOW MEASUREMENT

A. Flow Measurement Inspection Checklist-General

<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1. Primary flow measurement device is properly installed and maintained.
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	2. Flow records are properly kept.
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	3. Sharp drops or increases in flow value are accounted for.
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	4. Actual flow discharge is measured.
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	5. Influent flow is measured before all return lines. <i>at pump house</i>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	6. Effluent flow is measured after all lines.
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	7. Secondary instruments (totalizers, recorders, etc.) are properly operated and maintained.
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	8. Spare parts are stocked.

B. Flow Measurement Inspection Checklist-Flumes

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	1. Flow entering flume appears reasonably well distributed across the channel and free of turbulence, boils, or other distortions.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	2. Cross-section velocities at entrance are relatively uniform.
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	3. Flume is clean and is free of debris or deposits.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	4. All dimensions of flume are accurate.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	5. Side walls of flume are vertical and smooth.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	6. Sides of flume throat are vertical and parallel.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	7. Flume head is being measured at proper location.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	8. Measurement of flume head is zeroed to flume crest.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	9. Flume is of proper size to measure range of existing flow.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	10. Flume is operating under free-flow conditions over existing range of flows.

FLOW MEASUREMENT

C. Flow Measurement Inspection Checklist - Weirs

			1. What type of weir is being used?
YES	NO	N/A	2. The weir is exactly level.
✓			3. The weir plate is plumb and its top edges are sharp and clean.
✓			4. There is free access for air below the nappe of the weir.
✓			5. Upstream channel of weir is straight for at least four times the depth of water level, and free from disturbing influences.
✓			6. The stilling basin of the weir is of sufficient size and clear of debris.
✓			7. Head measurements are properly made by facility personnel.
		✓	8. Proper flow tables are used by facility personnel.

D. Flow Measurement Inspection Checklist - Other Flow Devices

			1. Type of flowmeter used: _____
			2. What are the most common problems that the operator has had with the flowmeter? _____ _____
			3. Measure Wastewater flow: _____ mgd; Recorded flow: _____ mgd; Error _____ %
			4. Design flow: _____ mgd.
			5. Flow totalizer is properly calibrated.
			6. Frequency of routine inspection by proper operator: _____ /day.
			7. Frequency of maintenance inspections by plant personnel: _____ /year.
			8. Frequency of flowmeter calibration: _____ /month.
			9. Flow measurement equipment adequate to handle expected ranges of flow rates.
			10. Venturi meter is properly installed and calibrated.
			11. Electromagnet flowmeter is properly calibrated.

LABORATORY QUALITY ASSURANCE CHECKLIST

A. General

YES	NO	N/A	
			1. Written laboratory quality assurance manual is available.

B. Laboratory Procedures

			1. EPA approved analytical testing procedures are used.
			2. If alternative analytical procedures are used, proper approval has been obtained.
			3. Calibration and maintenance of instruments and equipment is satisfactory.
			4. Quality control procedures are used.
			5. Quality control procedures are adequate.
			6. Duplicate sample are analyzed _____ % of time.
			7. Spiked samples are used _____ % of time.
			8. Commercial laboratory is used: <div style="margin-left: 100px;"> Name: _____ Address: _____ Contact: _____ Phone: _____ </div>

C. Laboratory Facilities and Equipment

			1. Proper grade distilled water is available for specific analysis.
			2. Dry, uncontaminated compressed air is available.
			3. Fume hood has enough ventilation capacity.
			4. The laboratory has sufficient lighting.
			5. Adequate electrical sources are available.
			6. Instruments/equipment are in good condition.
			7. Written requirements for daily operation of instruments are available.

LABORATORY QUALITY ASSURANCE CHECKLIST (continued)

C. Laboratory Facilities and Equipment (continued)

YES	NO	N/A	
			8. Standards are available to perform daily check procedures.
			9. Written trouble-shooting procedures for instruments are available.
			10. Schedule for required maintenance exists.
			11. Proper volumetric glassware is used.
			12. Glassware is properly cleaned.
			13. Standard reagents and solvents are properly stored.
			14. Working standards are frequently checked.
			15. Standards are discarded after shelf life has expired.
			16. Background reagents and solvents run with every series of samples.
			17. Written procedures exist for cleanup, hazardous response methods, and applications of correction methods for reagents and solvents.
			18. Gas cylinders are replaced at 100-200 psi.

D. Laboratory's Precision, Accuracy, and Control Procedures

			1. A minimum of seven replicates is analyzed for each type of control check and this information is on record.
			2. Plotted precision and accuracy control charts are used to determine whether valid, questionable, or invalid data are being generated from day to day.
			3. Control samples are introduced into the train of actual samples to ensure that valid data is being generated.
			4. The precision and accuracy of the analyses are good.

LABORATORY QUALITY ASSURANCE CHECKLIST (continued)

E. Data Handling and Reporting

YES	NO	N/A	
			1. Round-off rules are uniformly applied.
			2. Significant figures are established for each analysis.
			3. Provision for cross-checking calculations is used.
			4. Correct formulas are used to reduce to simplest factors for quick, correct calculations.
			5. Control chart approach and statistical calculations for quality assurance and report are available and followed.
			6. Report forms have been developed to provide complete data documentation and permanent records and to facilitate data processing.
			7. Data are reported in proper form and units.
			8. Laboratory records are kept readily available to regulatory agency for required period of time.
			9. Laboratory notebook or preprinted data forms are permanently bound to provide good documentation.
			10. Efficient filing system exists enabling prompt channeling of report copies.

F. Laboratory Personnel

			1. The analyst has appropriate training
			2. The analyst follows the specified procedures
			3. The analyst is skilled in performing analyses

Activity Code:

Distribution: White - Accompanies Shipment; Pink - Coordinator Field Files; Yellow - Laboratory File

ATTACHMENT 2

**CSC LTD., WARREN, OHIO
NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)
COMPLIANCE EVALUATION INSPECTION (CEI)**

ANALYTICAL REPORTS

(16 Pages)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5 CENTRAL REGIONAL LABORATORY

536 SOUTH CLARK STREET

CHICAGO, ILLINOIS 60605

Date: JUL 28 1997

Subject: Review of Region 5 Data for **CSC LTD**

From: Charles T. Elly, Director *Chuck Elly*
Region 5 Central Regional Laboratory

To: *PRC*

Attached are the results for **CSC LTD**

CRL request number 970310

for analyses for **Total Suspended Solids (TSS)**

Results are reported for sample designations: 97KR03S01, 97KR03S02, and 97KR03R06

Results Status:

- ☒ (X) Acceptable for Use:
- ☐ () Data Qualified, but Acceptable for use:
- ☐ () Data Unacceptable for Use:

- ☐ () Sewer Disposal Criteria Met;

Summary and Comments on Data Quality by Reviewer:

All the water samples submitted for TSS analysis were assayed and the results are attached. Required quality control criteria for the laboratory, method, and system performance audits were evaluated and determined to be within the limits.

Comments on Sample Results:

All the sample results are acceptable for use.

Comments by Laboratory Director or Quality Control Coordinator:

Francis A. Awanya

7/25/97

Review and Date

☒ Reviewed () Unreviewed

John Mon

25 July 87

Team Leader and Date

☒ Reviewed () Unreviewed

Chuck Elly

7/20/97

QC Coordinator and Date

() Reviewed (x) Unreviewed

Sylvia Griffin

JUL 28 1997

Data Management Coordinator and Date Received

Date Transmitted

JUL 28 1997

Please sign and date this form below and return it with any comments to:

Sylvia Griffin
Data Management Coordinator
Region 5 Central Regional Laboratory
SL - 10C

ENVIRONMENTAL PROTECTION AGENCY
REGION V
CENTRAL REGIONAL LABORATORY
FINAL RESULT REPORT FOR THE TEAM: MINERAL/NUTRIENTS

DIVISION/BRANCH: RCRA SAMPLING DATE: 06/25/97 LAB ARRIVAL DATE: 06/26/97 DUE DATE: 07/17/97
DU NUMBER: BFE DATASET NUMBER: 970310 STUDY: CSC LTD PRIORITY: Routine LABORATORY: CRL

SAMPLE #	CRL LOG NUMBER	SAMPLE DESCRIPTION	TOTAL SUSPENDED SOLIDS IN WATER (mg TSS/L)				
1	97KR03S01		5 U				
2	97KR03S02		9.2				
3	97KR03R06		5 U				
DATE OF ANALYSIS			06/30/97				
ANALYST			AR				

Reviewed by: Francis A. Awanya Date: 7 / 25 / 97

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY



REGION 5 CENTRAL REGIONAL LABORATORY

536 SOUTH CLARK STREET

CHICAGO, ILLINOIS 60605

Date: *JUL 17* 1997

Subject: Review of Region 5 Data for CSC Ltd.

From: Charles T. Elly, Director *Chuck E Elly*
Region 5 Central Regional Laboratory

To:

Attached are the results for CSC Ltd.

CRL request number 970310

for analyses for ICP

Results are reported for sample designations: 97KR03S01, 97KR03S02 and 97KR03R06

Results Status:

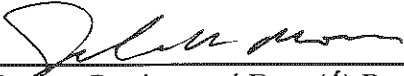
- ☒ (x) Acceptable for Use
- ☐ () Data Qualified, but Acceptable for use
- ☐ () Data Unacceptable for Use

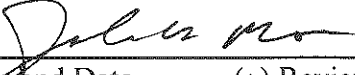
Comments on Data Quality by Reviewer


Zinc was reported with a detection limit of 20 µg/L. MDL data and blank studies have shown that this detection limit can be lowered from the previous level. Because of the permit level of 30 µg/L for zinc, this change was made for this survey. Silver matrix spike recovery was high (125%), outside the CRL acceptance limits of 100±15%. All silver results are below detection, so the data are unaffected. Lithium blanks were -16 µg/L, indicating a negative baseline drift. Lithium data are likely biased low between 10 and 20 µg/L. Antimony, cadmium, lead and thallium will not be analyzed by GFAA for these samples at the request of Water Division.

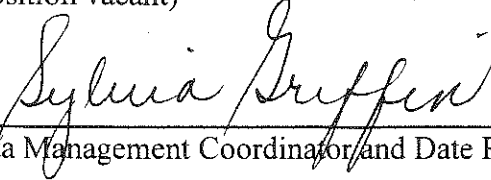
Comments by Laboratory Director or Quality Control Coordinator

Review Record for CSC Ltd.

 17 July 97
Peer/Task Monitor Review and Date (☒) Reviewed () Unreviewed

 17 July 97
Team Leader and Date (☒) Reviewed () Unreviewed

 7/17/97
QC Coordinator and Date () Reviewed (☒) Unreviewed
(position vacant)


Data Management Coordinator and Date Received

Date Transmitted **JUL 17 1997**

Please sign and date this form below and return it with any comments to:

Sylvia Griffin
Data Management Coordinator
Region 5 Central Regional Laboratory
ML - 10C

Received by and Date

Comments:

Sample 970310
Date analyzed 07/11/97

SAMPLE REPORT
97KR03S01
Correction 1.22000

SITE: CSC Ltd
File name RUN774

Element	Concentration	Units
Aluminum	80.0 U	micrograms/liter
Barium	17.0	micrograms/liter
Beryllium	1.0 U	micrograms/liter
Boron	299.	micrograms/liter
Cadmium	10.0 U	micrograms/liter
Calcium	60200.	micrograms/liter
Chromium	10.0 U	micrograms/liter
Cobalt	6.0 U	micrograms/liter
Copper	6.0 U	micrograms/liter
Iron	87.0	micrograms/liter
Lead	70.0 U	micrograms/liter
Lithium	71.3	micrograms/liter
Magnesium	14000.	micrograms/liter
Manganese	952.	micrograms/liter
Molybdenum	683.	micrograms/liter
Nickel	34.0	micrograms/liter
Silver	6.0 U	micrograms/liter
Sodium	125000.	micrograms/liter
Strontium	411.	micrograms/liter
Titianium	25.0 U	micrograms/liter
Vanadium	5.0 U	micrograms/liter
Zinc	20.0 U	micrograms/liter

run
17 May 97

KMS
7 15 97

Sample 970310 SAMPLE REPORT SITE: CSC Ltd
Date analyzed 07/11/97 97KR03S02 Correction 1.22000 File name RUN774

Element	Concentration	Units
Aluminum	97.2	micrograms/liter
Barium	25.2	micrograms/liter
Beryllium	1.0 U	micrograms/liter
Boron	290.	micrograms/liter
Cadmium	10.0 U	micrograms/liter
Calcium	52200.	micrograms/liter
Chromium	10.0 U	micrograms/liter
Cobalt	6.0 U	micrograms/liter
Copper	22.3	micrograms/liter
Iron	590.	micrograms/liter
Lead	70.0 U	micrograms/liter
Lithium	69.3	micrograms/liter
Magnesium	14000.	micrograms/liter
Manganese	143.	micrograms/liter
Molybdenum	744.	micrograms/liter
Nickel	36.6	micrograms/liter
Silver	6.0 U	micrograms/liter
Sodium	123000.	micrograms/liter
Strontium	405.	micrograms/liter
Titianium	25.0 U	micrograms/liter
Vanadium	5.0 U	micrograms/liter
Zinc	68.4	micrograms/liter

mm
17 July 97

KMS
7 15 97

Sample 970310
Date analyzed 07/11/97

SAMPLE REPORT
97KR03R06
Correction 1.22000

SITE: CSC Ltd
File name RUN774

Element	Concentration	Units
Aluminum	80.0 U	micrograms/liter
Barium	6.0 U	micrograms/liter
Beryllium	1.0 U	micrograms/liter
Boron	80.0 U	micrograms/liter
Cadmium	10.0 U	micrograms/liter
Calcium	500. U	micrograms/liter
Chromium	10.0 U	micrograms/liter
Cobalt	6.0 U	micrograms/liter
Copper	6.0 U	micrograms/liter
Iron	80.0 U	micrograms/liter
Lead	70.0 U	micrograms/liter
Lithium	10.0 U	micrograms/liter
Magnesium	100. U	micrograms/liter
Manganese	5.0 U	micrograms/liter
Molybdenum	15.0 U	micrograms/liter
Nickel	20.0 U	micrograms/liter
Silver	6.0 U	micrograms/liter
Sodium	1000. U	micrograms/liter
Strontium	10.0 U	micrograms/liter
Titianium	25.0 U	micrograms/liter
Vanadium	5.0 U	micrograms/liter
Zinc	20.0 U	micrograms/liter

James
17 July 92

KMS
7 15 97



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5 CENTRAL REGIONAL LABORATORY

536 SOUTH CLARK STREET

CHICAGO, ILLINOIS 60605

Date: JUL 15 1997

Subject: Review of Region 5 Data for AFE 970310 CSC LTD

From: Charles T. Elly, Director
Region 5 Central Regional Laboratory

A handwritten signature in black ink, appearing to read "Chuck Elly", is written over the typed name and title of the sender.

To:

Attached are the results for AFE 970310 CSC LTD

CRL request number 970310

for analyses for OIL & GREASE

Results are reported for sample designations: 97KR03S01, 97KR03S02, 97KR03R06

Results Status:

- (X) Acceptable for Use
- () Data Qualified, but Acceptable for use
- () Data Unacceptable for Use

Comments on Data Quality by Reviewer

Spike & spike duplicate % recoveries (ongoing precision & recovery) are 90.5 & 81.8 % , with a RPD of 10.2 % , within Method 1664 acceptance criterion of 79 - 114%. The HEM results for all three site samples were < 5 mg/L. Data are acceptable for use.

Comments by Laboratory Director or Quality Control Coordinator

Review Record for AFE 970310 CSC LTD

Erlinda Evangelista 7/15/97

E. Evangelista 7/15/97

Task Monitor/Peer Review and Date

(X) Reviewed () Unreviewed

Chi M. Tang

Chi M. Tang 7/15/97

Team Leader and Date

(X) Reviewed () Unreviewed

VACANT.

Chuck E. Lutz

7/15/97

QC Coordinator and Date

() Reviewed (X) Unreviewed

Sylvia Griffin

JUL 15 1997

Data Management Coordinator and Date Received

Date Transmitted JUL 15 1997

Please sign and date this form below and return it with any comments to:

Sylvia Griffin
Data Management Coordinator
Region 5 Central Regional Laboratory
SL - 10C

Received by and Date

Comments:

**ENVIRONMENTAL PROTECTION AGENCY
FOR THE TEAM: PESTICIDES & PCB'S**

DIVISION/BRANCH WATER
WECLAB

SAMPLING DATE 6/25/97

DATASET NUMBER 970310

LAB ARRIVAL DATE 6/26/97
STUDY CSC Ltd PRIORITY N

DUE DATE 7/17/97

CONTRACTOR PRC

[illegible]

FINAL RESULTS REPORT
PARAMETER: O & G (Hexane-Extractable Material)

SAMPLE ORGANIZATION:	SAMPLE BATCH ID: 970310
SAMPLE REQUESTOR: PRC	ACCOUNT NO: AFE
FACILITY: CSC LTD	SAMPLE ID: 97KR03 S01
MATRIX: WATER	UNIT: MG/L

RLIMS METHOD: 413.1 NS (EPA 1664)

DATE COLLECTED: 6/25/97	DATE RECEIVED: 6/26/97
DATE EXTRACTED: 7/9/97	DATE ANALYZED: 7/11/97

CAS NUMBER	COMPOUND	AMOUNT	QUALIFIER
	OIL & GREASE	2.75	

ANALYZED BY: Blair Duff *Blair Duff* 7/15/97
TEAM LEADER: J. Evangelista *J. Evangelista*

Qualifiers:

U - UNDETECTED

FINAL RESULTS REPORT
PARAMETER: O & G (Hexane-Extractable Material)

SAMPLE ORGANIZATION: SAMPLE BATCH ID: 970310
SAMPLE REQUESTOR: PRC ACCOUNT NO: AFE
FACILITY: CSC LTD SAMPLE ID: 97KR03 S02
MATRIX: WATER UNIT: MG/L

RLIMS METHOD: 413.1 NS (EPA 1664)

DATE COLLECTED: 6/25/97 DATE RECEIVED: 6/26/97
DATE EXTRACTED: 7/9/97 DATE ANALYZED: 7/11/97

CAS NUMBER	COMPOUND	AMOUNT	QUALIFIER
	OIL & GREASE	5.0	

ANALYZED BY: Blair Duff *Blair Duff* 7/15/97
TEAM LEADER: *J. Evangelista*

Qualifiers:

U - UNDETECTED

FINAL RESULTS REPORT
PARAMETER: O & G (Hexane-Extractable Material)

SAMPLE ORGANIZATION:	SAMPLE BATCH ID: 970310
SAMPLE REQUESTOR: PRC	ACCOUNT NO: AFE
FACILITY: CSC LTD	SAMPLE ID: 97KR03 R06
MATRIX: WATER	UNIT: MG/L

RLIMS METHOD: 413.1 NS (EPA 1664)

DATE COLLECTED: 6/25/97	DATE RECEIVED: 6/26/97
DATE EXTRACTED: 7/9/97	DATE ANALYZED: 7/11/97

CAS NUMBER	COMPOUND	AMOUNT	QUALIFIER
	OIL & GREASE	1.2	

ANALYZED BY: Blair Duff *Blair Duff* 7/15/97
TEAM LEADER: J. Evangelist

Qualifiers:

U - UNDETECTED

CASE NARRATIVE

DATA SET NO: AFE 970310
SITE NAME: CSC Ltd.
ANALYSIS: OIL & GREASE
Hexane-Extractable Material (HEM) by Method 1664

TO: Dr. Chi Tang, Team Leader, Organic Section
FROM: Blair Duff, Chemist
DATE: July 15, 1997

I. DATA SET DESCRIPTION:

This data set consisted of 3 water samples for oil and grease analysis, or what is now referred to as Hexane-Extracted Material or HEM in EPA method 1664. The extraction was carried out, using separatory funnels. The holding time of 28 days was met. The samples were collected on June 25, 1997 and were received in the laboratory on June 26, 1997.

There were no problems associated with the analysis.

II. INSTRUMENT QUALITY CONTROL:

The analytical balance used for this gravimetric procedure was calibrated prior to all weight measurements. No other instruments were used.

III. METHOD QUALITY CONTROL: The minimum quality assurance requirements for Method 1664 are initial demonstration of laboratory capability, ongoing analyses of standards and blanks, and matrix spike (MS) and matrix spike duplicate (MSD).

1. Method Blank

Reagent water was extracted with hexane and the HEM result was 0.4 mg/L. This is below the CRL interim detection limit of 2.0 mg/L, a value based on previous method blank analysis and the minimum level that has been set for HEM in Method 1664. There was no visible oily residue nor was there any sodium sulfate crystals in the blank.

2. Ongoing Precision & Recovery (Laboratory Spike & Spike Duplicate)

Spike and spike duplicate recoveries are 90.5% and 81.75%, with a RPD% of 10.2%. The spike recovery is acceptable under the criteria in Method 1664 of 79 - 114%.

3. Matrix Spike/Matrix Spike Duplicate

There were no MS/MSD water samples submitted to CRL for this data set. Extra sample volumes will have to be requested for future sampling activities.

IV. SAMPLE RESULTS:

The HEM results for the water sample were in the range of 1.2 - 5.0 mg/L.